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ABSTRACT

Presented is a manual designed to help state and local education agencies develop monitoring systems for special education services. A brief introductory section reviews the concept of monitoring compliance as set forth in P.L. 94-142, the Education for All Handicapped Children Act. Described are seven steps involved in developing such a system: identifying sources of authority, establishing a rationale, determining standards, developing methods and procedures, developing materials, conducting monitoring, and reporting the results. The bulk of the document is composed of examples form the states, including general procedures, guidelines for on-site monitoring, data forms (such as questionnaires, checklists, and interviews), and reporting and followup techniques. (CL)

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Developing the Compliance Monitoring System in Special Education:

A Process Manual for State and Local Education Agencies

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Thanks are extended

- to the task force which met for two days in July, 1977 in Austin, Texas to conceptualize and contribute major portions to the philosophy, content and format of the manual:

  Joanne Cooke, Maryland Department of Education; Wendy Cullar, Florida Department of Education; Wayne Spence, Washington Department of Education; Jo Ann Scott, Texas Education Agency; Suzanne Sadler, Arizona Department of Education; Gary Collings, Indiana Department of Education; Judy Reigelhaupt, Massachusetts Department of Education; and Jerry Vlasak, Compliance Officer for P.L. 94-142, Bureau of Education for the Handicapped, who contributed the BEH monitoring philosophy and approach which is presented as an operational example of the step-by-step process outlined in the manual.
- A special thanks is extended to Dr. Jeannette Walker, University of Illinois, Department of Special Education, who edited, organized, and synthesized the thoughts and contributions of the task force members in creating the original manuscript.
- Special recognition must be given to Mrs. Eileen Lavine, Bethesda, Maryland, for her editorial assistance and careful attention to detail in transmitting the original manuscript into final published format.

We also acknowledge the following State Education Agency resource manuals from which we have made liberal use of forms and examples for inclusion in the Appendices:

Exceptional Student Program Audit. Tallahassee, Fla.: Bureau of Education for Exceptional Students, Department of Education.

Program Review Manual. Indianapolis, Indiana: Division of Special Education, Department of Public Instruction, (draft).

Special Education Review System. Olympia, Wash.: Division of Special Programs and Services, Department of Public Instruction, (draft).

State Coordinator's Handbook. Phoenix, Arizona: Arizona Department of Education, (draft).

Team Leader's Handbook: Chapter 766 Program Audit. Boston, Mass.: Division of Special Education. Department of Education.

JAMES R. GALLOWAY
Executive Director

WILLIAM V. SCHIPPER
Associate Director

WILLIAM C. WILSON
Associate Director

TABLE OF CONTENTS

	Page
ACKNOWLEDGEMENTS	iii
PREFACE	vii
THE CONCEPT OF MONITORING IN SPECIAL EDUCATION	
Purposes	1
Definitions	1
Goals of the Monitoring System	1
Using the Discrepancy Evaluation Model	2
Three Phases in Developing a Monitoring System	2
FOUNDATIONS OF THE COMPLIANCE MONITORING SYSTEM	
Step 1: Identify the Sources of Authority	4
Step 2: Establish Rationale or Philosophy	5
Step 3: Determine Standards	6
DEVELOPING THE COMPLIANCE MONITORING SYSTEM	
Step 4: Develop Methods and Procedures	11
Step 5: Develop Materials	18
IMPLEMENTING THE COMPLIANCE MONITORING SYSTEM	
Step 6: Conduct Monitoring	19
Step 7: Report the Results	21
THINGS TO THINK ABOUT	
Self Check for System Developers	23
Anticipating Unanticipated Consequences	23
APPENDIX – EXAMPLES FROM THE STATES	
A. Standards	25
B. General Procedures	
1. Timelines	65
2. BEH Sampling Procedures	68
3. Letters	73
C. Guidelines for On-Site Monitoring	78
D. Data Forms	
1. Questionnaires	126
2. Interviews	143
3. Checklists	172
4. Observations	193
5. Summary Forms	194
E. Reporting and Followup	
1. Reporting Formats	203
2. Followup Activities	219
F. BEH Program Administrative Review Process: An Overview	222

PREFACE

Purpose of the Manual

The purpose of this manual is to provide a guide for developing a monitoring system for education agencies delivering services to exceptional children. While recognizing the uniqueness of individual agencies both across and within the local, state, and federal levels, it is felt that:

- the sequence of steps in developing a monitoring system is basically the same process for all agencies, and
- many of the alternatives chosen by an agency at any one step can serve as valuable examples and thought-provokers for other agencies.

There is nothing new or magical in the contents of this manual. It is primarily process-oriented, designed to lead monitoring system developers toward their own unique product, i.e., a monitoring system that fits their own unique needs. Checklists are provided to aid in this purpose, and each step offers examples and suggestions for consideration.

Audience—State and Local Education Agencies

This manual is directed primarily toward special education personnel in state education agencies (SEAs), and specifically toward those personnel responsible for developing monitoring systems which are responsive to standards reflecting the requirements of administrative agencies and of good practice. These individuals will find the manual of value both for developing state education agency monitoring systems and for providing technical assistance to local agencies in developing their own systems.

Because the process presented is a generic one, it is expected that the manual will also be directly useful to local education agencies (LEAs).

The reader should keep in mind that the manual will not do the job for you. You must bring to the planning process your own experience, resources and flexibility. If any section of the manual is not applicable or is incomplete for your purposes, delete or modify the approach in any way to adapt it properly to your specific situation.

Organization

The manual contains three types of information: introductory and overview material, process guidelines, and examples and suggestions. After a discussion of the concept of compliance monitoring and its application to special education, the manual is divided into three sections describing seven steps to be followed in developing a monitoring system. These sections contain a short introduction and process checklist and, within the checklist, a number of alternatives to consider for completing each item.

Where appropriate, sections also contain examples of alternatives chosen by some states that have already been involved in developing and implementing monitoring systems. At several steps, general suggestions from these states are included.

In addition to the process checklist and suggestions from states, each step contains information on the Federal monitoring system. This was derived from the monitoring system employed by the Bureau of Education for the Handicapped, and is included for two reasons:

- to provide an example of how one system has followed a development process which resulted in a product that meets its own unique requirements, and
- to offer information for use by SEA and LEA personnel that may be helpful in developing their own systems.

The manual also presents a short self-check process that system developers may use to chart their progress in developing monitoring systems. Finally, the manual contains an extensive Appendix which includes examples of procedures and forms used by various states. These may be used as a starting point for developing similar items.

Assumptions

The process presented in this manual is based on the following assumptions concerning responsive monitoring systems:

1) The necessity for monitoring systems at the local, state and federal levels is not open to question.

2) Monitoring procedures must apply to educational programs for all handicapped children, regardless of the setting in which they are delivered.

3) Those being monitored should know the standards against which their organizations and practices are being compared.

4) The purpose of monitoring is not to uncover programs that are out of compliance, but to identify areas in need of improvement.

5) Monitored programs have a right to technical assistance in meeting compliance standards when deficiencies are found.

6) Administrators of educational programs at all levels want to comply with specified standards and will adopt the necessary means to do so.

7) Monitoring procedures and information are useful not only to the agent doing the monitoring but to the agent being monitored.

8) One of the most valuable outcomes of monitoring is that it may guide the monitored agency through a self-improvement process.

9) The most useful monitoring systems will be those that are integrated across levels (local, state, federal), both in the standards used and in the processes for monitoring.

10) Most programs will wish to establish standards beyond those set by the next higher level as minimal.

Limitations in Using the Manual

Because of the generic nature of the processes presented in this manual, as well as the variety of possible alternatives, each reader may find terminology and administrative differences not directly applicable to his/her situation. This demands that the reader be flexible and open in order to select concepts which will be most helpful in meeting individual state and local needs.

It also should be remembered that the monitoring system must be compatible with the total administrative structure of the education agency developing it and with the organizational structure of education in that state. Data used for monitoring is only part of the data collected by any agency; every attempt should be made to combine data needs in order to design the most efficient system possible.

THE CONCEPT OF MONITORING IN SPECIAL EDUCATION

All levels of the educational system have responsibilities that are defined by law and by policy. Each level is responsible for complying not only with its own laws and policies, but also with those of the next higher levels from which it derives authority or funding.

The responsibility for assuring compliance with standards established within each state requires a monitoring system designed to audit and assess that compliance. At local levels, each education agency will monitor those aspects of its program that are required by its own policy-making body. The LEA will also participate in the monitoring system of the state education agency, which derives its authority for monitoring local systems from state legislative statutes and mandates and state policy-making bodies. In turn, the SEA must meet its own standards and those specified by any other agency from which it derives authority and/or funding, such as the United States Office of Education (USOE).

The role of USOE is to delineate standards and minimum expectations for agencies receiving federal funds, i.e., the SEAs and the LEAs. To insure compliance with these standards, USOE often has the authority in law to monitor these agencies. Under Public Law 94-142, this authority is derived primarily from Section 612.6, which holds the Bureau of Education for the Handicapped accountable for assuring that SEAs are responsible for the expenditure of funds under the Act. This section reads as follows:

> *The State educational agency shall be responsible for assuring that the requirements of this part are carried out and that all educational programs for handicapped children within the State, including all such programs administered by any other State or local agency, will be under the general supervision of the persons responsible for educational programs for handicapped children in the State educational agency and shall meet education standards of the State educational agency.*

Purposes of the Monitoring System

Approaches by the states to the monitoring tasks involved in assuring that educational standards are being met will be as varied and unique as are the educational settings themselves. There are, however, some essentials. An efficient and effective monitoring system should supply needed information to both the monitoring agent and the agent being monitored, and should be directed toward program improvement, as well as toward checking compliance to standards. Two major areas must be considered in designing a monitoring system that meets these standards:

- the content of the monitoring or what is to be monitored, and
- the elements of the system or the process of monitoring—when, where, by whom, what method, and in what order.

Definitions

Differences in terminology often interfere with meaningful communication. Terms used to describe similar concepts or functions often vary from state to state and from discipline to discipline. Therefore, to obtain maximum benefit from this manual, it is essential that the reader understand the meaning of the following three key terms as they are used by the task force which prepared this manual:

Monitoring—a continuous review procedure designed to compare present functioning against specified standards, and to yield a profile showing areas of conformance as well as those in which new procedures, training, or other method of improvement may be needed in order to comply with specific standards.

Standard—the content of monitoring, the programmatic variables such as child identification process, physical facilities, personnel, evaluation procedures, etc., against which SEA/LEA functioning will be compared. The intent of such a comparison is to answer the question, "Is this standard in evidence or operational?" Usually this question is answered by a simple yes/no.

Assurance—a strong statement of intent from one agent to another, such as from the LEA to the SEA stating that the LEA is in compliance with the minimum standards established.

Goals of the Monitoring System

The information obtained from a compliance monitoring system may be used to meet goals in at least three areas, all of which are related to compliance to specified standards and are directed toward

the general purpose of providing quality special education programs.

Regulatory goals

1. To verify that state and/or federally funded special education programs are in compliance with state and/or federal rules, regulations, and guidelines;
2. To assure that children who cannot be served in the local school program receive an appropriate education in accordance with state and/or federal rules, regulations, and guidelines;
3. To determine the extent to which educational programs are accomplishing stated goals and objectives.

Technical Assistance Goals

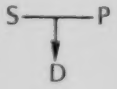
1. To provide the LEA/SEA with an overview of its programs from a broader perspective;
2. To identify areas in which technical assistance is needed to remedy problems that may reduce the effectiveness of special education programs.

System Improvement Goals

1. To provide data for improvement of components of the monitoring system (i.e., standards, procedures);
2. To provide data for local, regional, and statewide planning of programs.

Using the Discrepancy Evaluation Model

A useful conceptual tool for compliance monitoring is the Discrepancy Evaluation Model as illustrated in Figure 1. This model is based on the assumption that standards for performance may be specified, and that actual performance can be measured and compared to these standards; any discrepancy then becomes the basis for planning improvements in the system.



S = Standards
P = Actual Performance
D = Discrepancies, i.e., areas of non-compliance or areas needing improvement

Figure 1. Illustration of Discrepancy Evaluation Model

Because discrepancies are specifically identified, planning activities may be directed toward accomplishing specific objectives which will bring the system closer to the standards. Monitoring information collected within this model is thus extremely useful as a basis for providing technical assistance, as well as for documenting compliance.

Three Phases in Developing A Monitoring System

Designers of any compliance monitoring system must first know where the authority and responsibility for monitoring lie and the extent and limits of that authority.

From this, a set of compliance standards must be developed and disseminated; at that point, an appropriate approach for measuring compliance can be developed.

The steps depicted in the accompanying flow chart show the developmental stages for deriving a responsive monitoring system and form the basis for the conceptual process presented in this manual. The initial steps in the process call for a clear specification of the sources of authority, the rationale or philosophy underlying the monitoring program, and the standards developed for compliance monitoring.

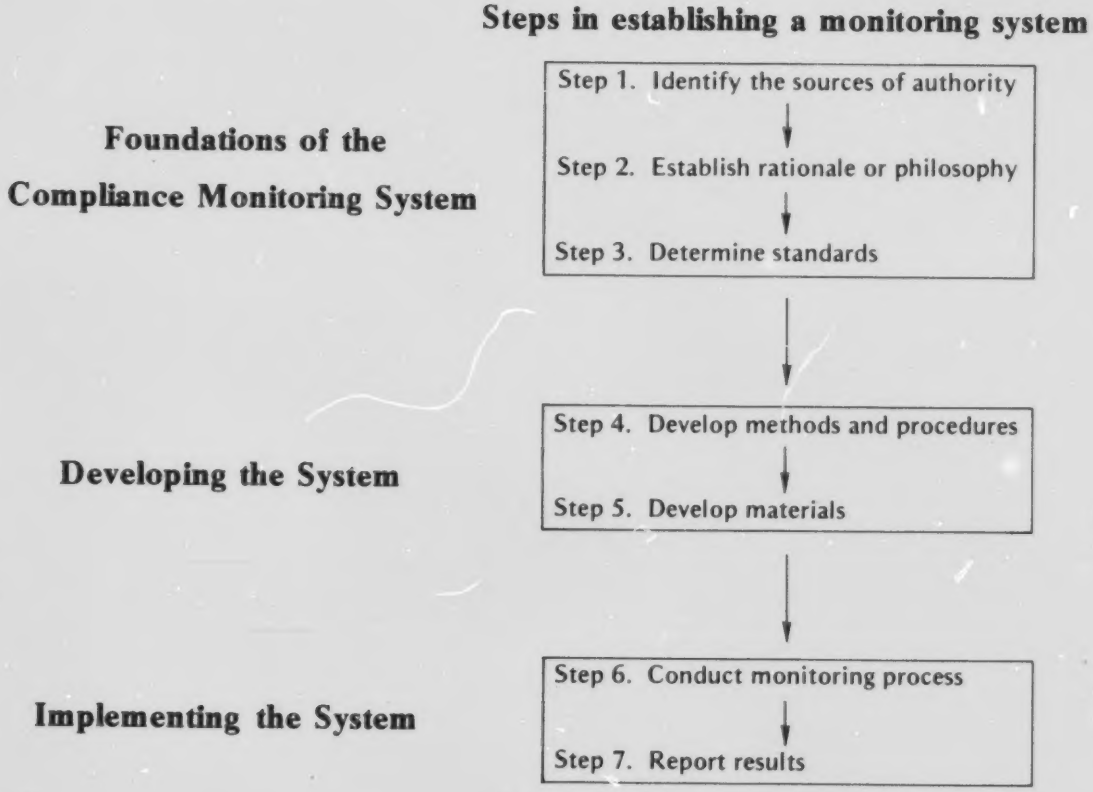
Once these are specified, the planners of the system may design an appropriate methodology, develop procedures and materials, implement the monitoring process, and report findings of the "state of affairs" and what may need to be done to correct any shortcomings. This report is the connecting element that provides the feedback conponent of the flow chart and allows the discrepancy to become the focus of technical assistance and training.

Within the present manual, these steps are clustered into three phases which reflect:

- planning the foundations of the monitoring system,
- developing the system, and
- implementing the system.

These phases are illustrated in the flow chart, and reflect the organization of the next three major sections of the manual.

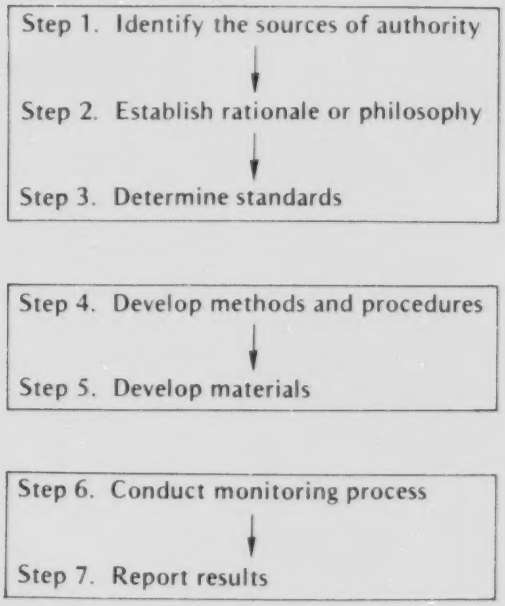
FLOW CHART FOR ESTABLISHING A MONITORING SYSTEM


Steps in establishing a monitoring system
Foundations of the Compliance Monitoring System
Step 1. Identify the sources of authority
Step 2. Establish rationale or philosophy
Step 3. Determine standards
Developing the System
Step 4. Develop methods and procedures
Step 5. Develop materials
Implementing the System
Step 6. Conduct monitoring process
Step 7. Report results

FOUNDATIONS OF COMPLIANCE MONITORING

STEP 1:

Identify the Sources of Authority


Step 1. Identify the sources of authority
Step 2. Establish rationale or philosophy
Step 3. Determine standards
Step 4. Develop methods and procedures
Step 5. Develop materials
Step 6. Conduct monitoring process
Step 7. Report results

An essential first step in developing any monitoring system is to determine the sources of authority for the areas of performance for which the monitoring agency is responsible. These sources may be legislation, policy statements, rules and regulations, and state or local education plans.

A careful reading of these documents will yield a list of areas for which monitoring is required, and an indication of the agency responsible for such monitoring. The documents from which this information is derived then become the authority for monitoring.

An example of a state law that provides authority for monitoring is Chapter 766 in Massachusetts. Under 766, the State Department of Education is required to monitor special education programs in local school districts; the content of the monitoring process covers the programmatic requirements specified in the law. Thus the law is the authority under which monitoring is carried out, and it thus becomes possible to reference a section of the law for each standard specified for monitoring.

FEDERAL MONITORING AUTHORITY

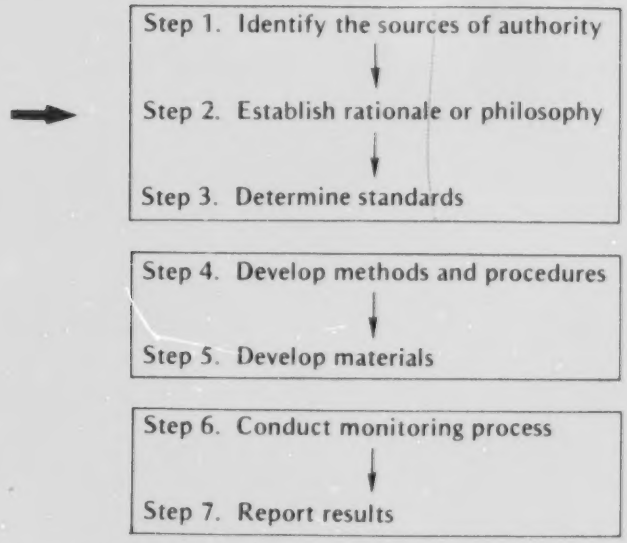
Monitoring activities, termed Program Administrative Reviews, within the Bureau of Education for the Handicapped are conducted routinely for each state and territory, to determine the extent to which they are in compliance with the provisions of P.L. 94-142 and P.L. 89-313. These laws provide the authority for monitoring activities of the Federal Government. Descriptions of each phase of BEH monitoring activities are presented in this manual as part of each step of the developmental process.

The following provisions illustrate legislative authority for monitoring under these laws:

1. ESEA Title I P.L. 89-313, General Provisions for Programs Subpart Q Monitoring and Reporting of Program Performance 100b. 436: "Site Visits will be made by representatives of the Department of the Commissioner as frequently as practicable to. . review program accomplishments and management control systems. . . ."
2. EHA-B, as amended by P.L. 94-142, [Section 616(a)]: "Whenever the Commissioner finds that there has been a failure to comply substantially with any provision of Section 612 or Section 613 or that in the administration of the State Plan there is a failure to comply with any requirements set forth in the application of a local educational agency or intermediate education unit approved by the State Educational Agency pursuant to the State plan, the Commissioner . . . may . . . withhold further payments." [20 U.S.C. 1416(c)]

STEP 2:

Establish Philosophy


Step 1. Identify the sources of authority
Step 2. Establish rationale or philosophy
Step 3. Determine standards
Step 4. Develop methods and procedures
Step 5. Develop materials
Step 6. Conduct monitoring process
Step 7. Report results

Each education agency responsible for developing a monitoring system must determine its own general philosophy toward monitoring. This philosophy then becomes the backdrop against which the system is developed.

For example, the task force which developed this manual defined its own philosophy toward monitoring, as stated in the Preface. This philosophy or rationale could be used as an example and applied by state and local education agencies.

FEDERAL MONITORING PHILOSOPHY

According to BEH philosophy, it is not an intent of monitoring to "catch" state or local agencies in non-compliance. If agencies and other participants use BEH materials to analyze programs and, after considering the information yielded by such analysis, make changes to bring services and programs more closely into compliance with Federal statutes and regulations, so much the better for handicapped children and their parents.

The monitoring process used by BEH is termed Program Administrative Review, and this process is just one mechanism for documenting that a particular situation actually exists.

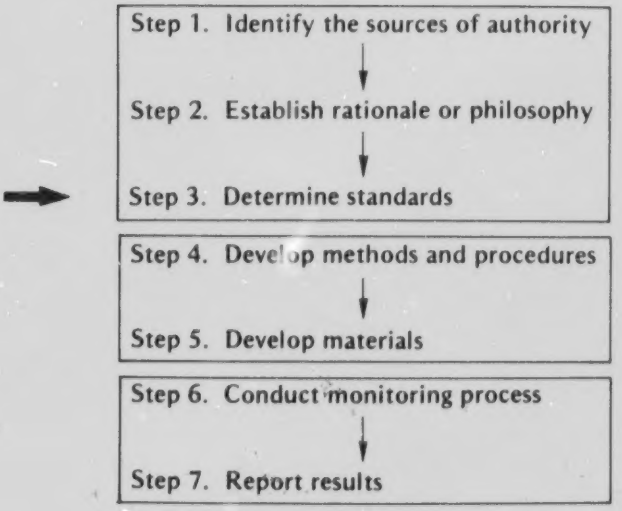
In order to minimize questions and emphasize the constructive aspects of monitoring, BEH disseminates all procedures, materials, and other information relating to the Program Administrative Review process as early in each annual cycle as possible. Materials, questionnaires, interview guides, and descriptions of procedures are sent to all participants previous to each Program Administrative Review. This procedure is designed to allow recipients to prepare for interviews and conduct self-studies, if desired.

Self-Study

The LEAs, SEAs, State Operated Programs (SOPs), advisory panels and parent groups can capitalize on the advance receipt of Program Administrative Review procedures and materials by conducting "self-study" activities prior to the actual on-site phase conducted by BEH personnel. Changes in policies, procedures, and practices made any time previous to the site visit are recognized as being in effect and "in compliance." This same procedure can be used by the SEA and agencies it monitors.

STEP 3:

Determine the Standards for Monitoring


Step 1. Identify the sources of authority
Step 2. Establish rationale or philosophy
Step 3. Determine standards
Step 4. Develop methods and procedures
Step 5. Develop materials
Step 6. Conduct monitoring process
Step 7. Report results

The content (standards) for monitoring is at the heart of the entire monitoring process and should reflect both the authority base and the philosophy of the monitoring agent. Furthermore, the monitoring standards should be presented in a format that is measurable.

While commonalities do exist among systems, the amount of variation makes it impossible to list "the standards" that would be generic to all education agencies. With the passage of P.L. 94-142, standards will undoubtedly become more "standardized." But each state will undoubtedly have its own standards, which may go beyond those in federal law and regulation. This section, therefore, presents a process for deriving standards.

Standards may contain additional specifications drawn from guidelines, policy or planning documents at any level. These may reflect varying degrees of sophistication in the process of developing programs, as well as differing beliefs. It is conceivable that state and local agencies will have different standards due to policy differences, as well as standards in common. If SEAs and LEAs plan to go beyond the standards established by law or policy, they must provide additional monitoring standards in conformance with an authority and philosophy base.

Possible differences between education agencies in the set of standards resulting from this process are illustrated in Table 1, which lists several standards in the area of public awareness from two different states. The Appendices contain further examples of the content and organization of standards as they have been developed by representative states.

While the final set of standards developed for any education agency will depend upon the sources from which they are drawn, and thus may be different from those of another agency, the procedure for developing standards remains essentially the same.

Table 2 contains a suggested procedure for developing monitoring standards. This procedure reflects three basic functions:

(a) determining the content,
(b) insuring the authority base, and
(c) organizing standards for monitoring.

The format into which these functions are organized may serve as a planning guide for the state or local education agency in developing the content of its monitoring system. Columns are provided for specifying the individual to be responsible for each function and step in the procedure, indicating the date for completion of each, and for checking off when each step has been completed.

Table 1: Differences in Standards Between Education Agencies: Examples in Public Awareness from Two States

State A	State B
Area: Public Awareness	*Area: Public Communication*
1. Efforts to create public awareness of special education opportunities are documented.	1. Annual or more frequent community-wide communication such as informal meetings, workshops and printed materials are provided for parents and community members concerning special education programs and procedures.
2. Information regarding the rights of handicapped children is in a language which is understandable regardless of ethnic, linguistic or cultural background.	2. On-going public information articles and programs in local media are provided.
3. Local school district awareness system includes procedures for locating, identifying and referring handicapped children who are not in school or who do not have access to a special education program.	3. Notices to parents of students in need of special services regarding their rights and special education procedures are clear, non-legalistic and written in the primary language of the home.
4. Public awareness system includes a procedure for making an appropriate program available to all handicapped children identified.	4. Parent and professional involvement is encouraged through an Advisory Committee or other organized group.

Table 2: Procedure for Developing Monitoring Standards

Function	Procedure	Individual Responsible	Timeline	Completed
Determining content				
1.1 Review laws, policies and procedures	1.1.1 Obtain copies of all relevant state and federal legislation and policies			
	1.1.2 Examine consistencies and areas of conflict			
	1.1.3 Develop procedures for resolving conflicts (e.g., Attorney General's opinion)			
	1.1.4 Finalize content list			
Insuring authority base				
2.1 Investigate need for legislation, board approval or other interpretation of laws and policies	2.1.1 Cite authority for each item in final content list (1.1.4)			
	2.1.2 Identify content items for which there is no authority base			
	2.1.3 Determine method of obtaining authority for each item in 1.1.4 (e.g., state board must adopt a policy)			
	2.1.4 Determine/assign administrative responsibility for each method identified in 2.1.3			
	2.1.5 Finalize content list with authority identified for each item			

TABLE 2-Continued

Function	Procedure	Individual Responsible	Timeline	Completed
Organizing for monitoring				
3.1 Determine major areas	3.1.1 Examine content list in 2.1.5			
	3.1.2 Group content into major areas			
3.2 Construct questions	3.2.1 Develop master list of questions to cover all content items under each major area			
	3.2.2 Review content list (2.1.5) to insure that all areas are adequately covered			
	3.2.3 Adjust master list of questions to fit data collection methods (e.g., interview, checklist) and sources (e.g., administrators, parents)			
	3.2.4 Pretest questions to insure clarity and reliability			

FEDERAL MONITORING STANDARDS

BEH utilizes essentially three types of program standards to determine the extent to which State policies, procedures, and practices are in compliance with Federal requirements. These are Federal statutes, Federal final regulations, and the provisions of each State's most current annual Program Plan.

Statutes

The Education for The Handicapped Act—Part B (as amended by P.L. 94-142) and the Elementary and Secondary Education Act – Title I (as amended by P.L. 89-313) are the laws used as statutory standards in the Program Administrative Review process.

Regulations

Since statutes are often too general to serve as adequate standards for compliance monitoring purposes, specific educational standards must be developed to determine whether discrepancies exist between rules (what is required) and practice (what exists). Such standards must also be adopted formally so that any findings and corrective actions recommended by monitoring personnel will be accepted and acted upon by program managers.

In the case of P.L. 94-142, final regulations now exist to facilitate this process (published in the Federal Register August 23, 1977). At this point, no final regulations exist to assist in the implementation and monitoring of P.L. 89-313.

Annual Program Plans

The Annual Program Plans (APPs) submitted to BEH by each SEA describe the methods and processes that individual SEAs will use to implement statewide delivery systems for handicapped children. Once an SEA has submitted an approvable APP, the state is expected to implement programs and services in a manner consistent with that plan.

When changes in strategy are deemed necessary, the SEA is required to submit an amendment to the U.S. Commissioner. Therefore, the descriptions of specific processes and activities submitted to BEH become unique, State-specific sets of standards which BEH monitors. LEA and other local-level plans can also serve as unique program standards against which SEAs can monitor.

...In general, the more specific, measurable and clear the educational standards, the more compliance monitoring activities can be rational, valid and constructive.

Programmatic Variables to Be Monitored by BEH

The Program Administrative Review process is designed to monitor only certain aspects of the provisions of P.L. 94-142 and P.L. 89-313. These aspects, termed "Programmatic Variables," vary somewhat depending on the source of information. These same programmatic variables should be contained within the state system for monitoring local agencies. If the authority base of the state goes beyond the programmatic variables listed, then an expanded list would be appropriate.

The Programmatic Variables for FY '78 are as follows:

P.L. 94-142

- Development of Annual Program Plan
- Right to Education Policy
- Full Educational Opportunity Goal
- Priorities
- Child Identification
- Individualized Education Program
- Procedural Safeguards
- Confidentiality
- Least Restrictive Environment
- Protection in Evaluation Procedures
- Comprehensive System of Personnel Development
- Participation of Private School Children
- Placement in Private Schools
- Program Monitoring
- SEA Responsibility for all Programs
- Program Evaluation
- Reporting
- Child Count Procedures
- Administration of funds by SEA/LEA/IEU
- State Advisory Panel

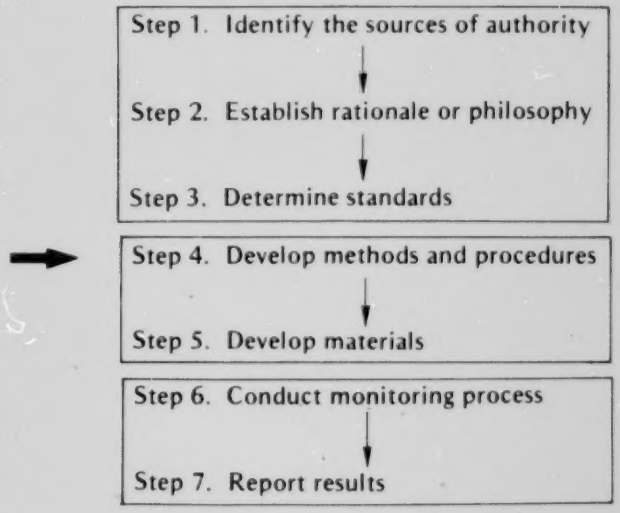
P.L. 89-313

- Agency Eligibility
- Children to Receive Benefits
- Transfers
- Evaluation Design
- Measurable Goals and Objectives
- Administration and Technical Assistance
- Dissemination
- Distribution of Funds
- Supplemental Use of Funds

DEVELOPING THE COMPLIANCE MONITORING SYSTEM

STEP 4:

Determine Methods and Procedures


Step 1. Identify the sources of authority
Step 2. Establish rationale or philosophy
Step 3. Determine standards
Step 4. Develop methods and procedures
Step 5. Develop materials
Step 6. Conduct monitoring process
Step 7. Report results

When the specification of standards and programmatic variables is complete, system developers may move to the next phase, determining the methods and procedures to be used in conducting the monitoring process.

DETERMING METHODS

Primary consideration should be given to:

- The purposes of monitoring (e.g., to determine compliance, to identify technical assistance needed);
- The standards to be monitored,
- The capabilities and organization of the system (e.g., number of people who can take responsibility for monitoring, presence of a regional education agency).

Given these considerations, the process or method used for monitoring offers a number of possibilities in a variety of different areas which need to be addressed. The system must provide answers to the following:

(1.) Who monitors (state education agency, peer team, 3rd party, etc.);
(2.) What are the sources of data (parents, staff, records, etc.);
(3.) What are the data collection techniques (analysis of records, questionnaire, observation, etc.).
(4.) Where will monitoring occur (off-site, on-site).

The task of the planners of the monitoring system is to choose from among the sets of available alternatives those elements that best fit their purposes and capabilities.

Every attempt should be made to coordinate standards, procedures, and forms across all levels. In addition, monitoring procedures should be as clear and concise as possible, so that the individuals who do the monitoring and those who are monitored clearly understand:

(a) what is expected of them, and
(b) the authority behind those expectations.

Each of these sections is presented in the form of a checklist, with a group of questions within each area that must be considered in that phase of development. Where appropriate, possible alternatives accompany some questions. Further examples of alternatives will be found in the Appendices.

DETERMINING PROCEDURES – A CHECKLIST

Establishing guidelines for actual implementation of the total monitoring system is primarily a matter of determining who does what and under what conditions. The checklist presented below is designed to help the reader think through considerations which are basic to establishing a monitoring system that will be integral to the ongoing administration functions and needs of the agency.

Purposes

__Have the purposes of monitoring been clearly specified?
- compliance with rules, regulations, and policy
- identify technical assistance needs

__Have the purposes of monitoring at each level of the system been identified and integrated?
- federal
- state
- regional
- local district

Focus

__Have the areas to be monitored been identified?
- total program
- program component (e.g., early childhood)
- service area (e.g., speech therapy)

__Has an integrated system for summarizing, recording, storing and maintaining data been established across different levels of the process?
- manual or computer system established
- responsibility assigned
- timelines set

__Has the use of data been specified for each step in the monitoring process?
- independent collection of data at each step
- cumulative data (each step reviews data collected before)

Responsibility

__Has responsibility been assigned at all levels for each step in planning the system?
- determining and stating standards
- conceptualizing the system
- disseminating standards and procedures
- developing and standardizing materials
- determining sampling procedures

__Has responsibility been assigned at all levels for each step in implementing the system?
- coordinating and managing the process
- choosing monitoring personnel
- training monitoring personnel
- serving on the monitoring team
- serving as chairperson of the monitoring team and process chairperson, the team, and administrator)
- writing the preliminary and/or final report
- providing feedback to the site
- providing follow-up
- providing technical assistance
- implementing sanctioning procedures
- responding to problems and/or requests

Implementation Process

__Does the system meet all requirements of due process?
- confidentiality
- right to appeal
- prior notice
- other

__Has a timeline been established for identifying responsibilities of monitors and programs to be monitored?

__Has the procedure been established for initiating and implementing the system?
Does the process conform to the requirements of rules and policies at all levels?

__Has a systematic procedure been established for follow-up?
- reporting
- correction of deficiencies
- technical assistance
- appeal
- sanctions

__Have a variety of models been compared in terms of cost effectiveness, needs, and capabilities?
- self-evaluation
- peer monitoring
- SEA monitoring
- third party monitoring

Data Needs

__Have the types of data needed for each identified purpose been outlined?
- frequency of occurrence
- number of children
- quality ratings
- other

__Have the most useful forms of data summary been specified?
- frequency
- percentage
- other

__Has a system been established for utilizing the same data for different purposes to the greatest extent possible?
- cross-referencing to different authorities
- joint planning of data collection procedures
- other

__Have techniques for collecting data been specified?
- questionnaire
- interview
- checklist
- observation
- other

Staff

__Has the membership of the monitoring team been established?
- individual
- teams with a core or specified membership
- core membership plus others

__Have the types of monitors to be used been established?
- permanent/temporary task
- full/part time
- inside/outside administration

__Have personnel selection criteria been established?
- expertise
- availability
- knowledge of law

__Has the process for choosing monitors been established?
- rotating task
- volunteer
- consultant
- appointed

__Have procedures been established for training of monitoring staff?
- who will be trained (e.g., total staff, team leader)
- focus of training (e.g., the law, writing reports, sensitivity to people in monitoring programs, examination of files, interviewing techniques)
- where and when training will occur (e.g., statewide workshop once a year, as part of on-site preparation)

__Are written role descriptions developed and available to each person on the monitoring team?

Scheduling

__Do scheduling procedures allow a consideration of constraints on the monitored system?
- interview time of specific staff members
- availability of records in specific locations
- number of staff to be interviewed
- number and location of schools

__Do procedures allow for subdividing large systems into smaller subsystems for more efficient monitoring?
- minimizing travel time
- minimizing logistical problems

Sampling

__Have systematic procedures been established for sampling sites, programs, and procedures?
- systematic rotation
- random sampling
- random sampling number/site
- response to request of site
- response to problem at site

__Does the process fit the realities of the situation?
- total number of districts to be monitored
- number of available staff
- availability of regional personnel to conduct monitoring

__Does the process include a consideration of Federal, statewide and/or local priorities?
- establishing of new programs
- developing IEPs
- establishing due process procedures
- increasing number of children served

A SPECIAL NOTE ON STAFFING

The staffing of monitoring programs, particularly on-site monitoring, has received much more attention in the literature and among program people nationally than some other considerations. This concern has been in two basic areas;

(a) The types of personnel who should be included in on-site visitations and their roles in monitoring.

(b) The models chosen for the actual on-site collection of data.

These topics are discussed in more detail in the following sections:

Management Roles

Any agency which implements a special education monitoring system obviously has its own administrative structure. The personnel responsible for different aspects of the monitoring process will, therefore, vary from agency to agency. Some alternatives for staffing the monitoring process are presented below. Common staff assignments and selected sample role descriptions are listed. Further examples may be found in the Appendices.

STATE EDUCATION AGENCY

Personnel involved:

a) state board
b) chief state school officer and other top administrative staff
c) special education staff
d) external auditing staff
e) state advisory council

Sample Role Description: Chief State School Officer

a) approve overall monitoring process
b) communicate purposes and policies for monitoring to superintendents, public, and press
c) receive, approve, and issue reports
d) hear any appeals

Sample Role Description: Special Education Staff:

a) develop guidelines and procedures for monitoring
b) communicate guidelines and procedures to LEA parent groups and monitors
c) coordinate monitoring process
d) provide technical assistance to LEAs
e) provide training to SEA and LEA personnel
f) supervise monitors
g) conduct monitoring tasks
h) review and report results
i) analyze findings to determine and meet statewide program needs
j) provide technical assistance, resource materials, and inservice training to assist in program improvement statewide

LOCAL EDUCATION AGENCY

Personnel Involved:

a) school board members
b) superintendent of schools
c) director of special education programs
d) school administrators
e) special education supervisors
f) teaching staff
g) ancillary staff
h) parents

Sample Role Description: Director of Special Education Programs

a) communicate purposes and procedures to staff, parents, and community
b) design and implement local monitoring system that meets local needs and provides data for SEA monitoring
c) coordinate scheduling and local logistics of SEA monitoring process
d) provide access to programs and personnel
e) supervise staff for cooperation with monitors
f) review initial report for accuracy of findings and provide feedback to SEA
g) analyze findings and recommendations and communicate to top administration and school board those items needed to maintain or improve programs or to correct deficiencies
h) provide feedback to SEA for modifying monitoring system

Sample Role Description: LEA Staff

a) participate in monitoring according to model chosen
b) provide data access to records

Monitoring Models

While alternatives may be combined in a variety of ways to meet particular needs of a given monitoring agency, some models used for on-site monitoring have been used more commonly. These are presented below, along with some of their advantages and disadvantages. These models are differentiated primarily by who does the data collection.

SEA Team

- *Definition:* The staff of the state education agency, whether centralized or regional or both, is assigned to monitor all special education programs, procedures, and services within a local or regional district.
- *Advantages:*
  a) Cadre of staff well-trained in monitoring procedures,
  b) Ability to support special education within the regular education system,
  c) Monitoring staff with expertise in a variety of areas.
- *Disadvantages:*
  a) Previous involvement of SEA staff in other roles such as program development,
  b) Possible role conflict between monitoring and technical assistance,
  c) Lack of involvement of parents, local level staff, etc.

Multidisciplinary Team

- *Definition:* A team of individuals is selected for monitoring special education programs, procedures, and services from various perspectives. The team may include SEA staff, parents, university staff, educators from other school districts, and individuals from other public or private agencies.
- *Advantages:*
  a) Broad base of expertise,
  b) Experience brought back to constituency they represent,
  c) Increased communication between professionals and constituents.
- *Disadvantages:*
  a) Funding needed for team expenses,
  b) Repeated training necessary,
  c) Coordination efforts may be difficult,
  d) Difficulties in generating full participation.

Peer Team

- *Definition:* A team of educators from other local school districts is selected for monitoring by matching team members' expertise with similar areas in the district to be reviewed.
- *Advantages:*
  (a) Inservice education for all peer monitors in own area,
  (b) Experience taken back to own agencies,
  (c) Allows for training of increasing number of persons,
  (d) Dissemination of program ideas,
  (e) Training of monitors in monitoring.
- *Disadvantages:*
  (a) Funding for team expenses,
  (b) Repeated training necessary,
  (c) Coordination efforts difficult,
  (d) Conflict between professionals possible.

Individual Review

- *Definition:* An SEA staff member is assigned to monitor a particular exceptionality program or service area.
- *Advantages:*
  (a) Expertise of SEA professional in the program area,
  (b) More easily implemented,
  (c) Long-term contact possible,
  (d) Technical assistance can be immediately responsive to problem areas.

- *Disadvantages:*
  (a) Limited view of total special education program and services,
  (b) Lack of coordination of monitoring standards across disciplines,
  (c) Possible conflict between monitoring and technical assistance roles,
  (d) Preconceived ideas about quality of the program,
  (e) Previous involvement in a decision-making or management capacity.

Self-Evaluation

- *Definition:* An ongoing and systematic self-review of special education programs, procedures, and services is carried out by personnel within their own district.
- *Advantages:*
  (a) Personnel involved in determining their own needs,
  (b) Acts as an inservice experience,
  (c) Creates an impetus for change,
  (d) Non-threatening.
- *Disadvantages:*
  (a) Credibility of the data for higher level uses,
  (b) No assurance that requirements of monitoring are met,
  (c) Lack of outside perspective.

Third-party Evaluation

- *Definition:* External consultants such as university personnel or private firms are contracted to monitor special education programs, procedures, and services; these may be limited to a particular funding contract.
- *Advantages:*
  (a) Objective opinion,
  (b) Expertise of consultants,
  (c) Savings in staff time.
- *Disadvantages:*
  (a) Cost,
  (b) Loss of learning experiences by staff,
  (c) May provide only limited focus.

Document Review

- *Definition:* Review and approval of submitted program plans, completed forms, and required reports are integrated into compliance monitoring.
- *Advantages:*
  (a) Requires less staff time than on-site monitoring,
  (b) Sources can be re-examined.
- *Disadvantages:*
  (a) Limited to submitted materials,
  (b) No opportunity for verification of information,
  (c) Technical assistance value is lost,
  (d) No involvement of different areas of expertise.

FEDERAL MONITORING METHODS

Methods of Conducting Compliance Monitoring

The three general methods used by BEH to conduct compliance monitoring activities are: (1) processing applications, (2) processing "end of period" performance data, and (3) monitoring the implementation phase(s) of educational programming through process (or on-site) monitoring. The BEH utilizes all three in the administration of PL 94-142 and PL 89-313.

(1) Processing of Applications

P.L. 94-142 requires each participating state to submit an Annual Program Plan (APP). These annual plans spell out the methods that will be used to implement the major programmatic variables of Federal and state statutes and regulations. While the greatest value of such program planning is that it leads to better programs, the development of annual plans also sets up the criteria that will be used for evaluation as programs are implemented. (The application of this concept to local level programs is obvious when the PL 94-142 requirement for "LEA applications" is considered).

Once BEH has determined that a state's APP meets approval criteria, one aspect of the compliance monitoring task becomes one of comparing state procedures and practices to state plans (APPs).

(2) Processing Performance Data

BEH collects specific data, usually at the end of each fiscal year, that is designed to describe the activities actually completed, resources actually expended, and objectives actually realized. For example, dollars spent, personnel hired, training accomplished, children served, IEPs developed, and children identified, located, and evaluated are measures of performance. The comparison of performance information to planning information is then a second method of compliance monitoring.

(3) Monitoring Implementation (Process Monitoring)

This third major method of conducting compliance monitoring usually involves the on-site observation policies, procedures, records, and other evidence that services are being delivered in a man-

ner consistent with standards. BEH's Program Administrative Review process is of this type or method, and the following procedures describe the way the process is being currently implemented (FY '78). These procedures have been revised from those used in FY '77 and will, in all probability, continue to undergo revision as better methods evolve.

BEH Procedures for FY '78

(1) Utilizing Structured Interviews

Structured interviews are used to collect information from all five sources. After questionnaire data from LEAs and SOPS are analyzed, structured interviews are conducted within a subsample of school districts and PL 89-313 recipients during the week of the site visit. Interviews structured by interview guides are utilized to collect data from SEA, advisory panel and parent group participants.

The development of interview guides was deemed necessary in order to assure equitable application across time, states and sources. This method also increases the likelihood of adequate documentation by BEH interviewers. Additionally, it is hoped that the existence and prior availability of these guides will facilitate and encourage "self-study" and other preparation activities on the part of interviewees.

(2) Staffing of Compliance Monitoring Activities

BEH attempts to staff each Program Administrative Review with a minimum of four professional staff members of the Assistance to States Division. The State Plan Officer for the HEW region in which a particular state is located serves as the chairperson of the site visit team. Additional members are drawn from other staff of the Field Services Branch, staff from the Administrative Review Section, and staff from the Policy Development section. Also, BEH personnel from other Divisions assist in the conducting of Program Administrative Reviews as appropriate.

(3) Sources of Information

Information is collected by BEH in various formats from five types of sources: a) SEA personnel, b) LEA personnel, c) State Operated Program personnel, d) Statewide Advisory Panel members, and e) parent group members.

Within the SEA, information is obtained from a variety of personnel, including the State Director of Special Education and members of his/her staff as deemed appropriate by the director. In addition, brief interviews are conducted with any SEA staff whose salaries are partially or wholly provided from EHA-B administrative funds. Every effort is also made to speak with personnel from the Vocational Education unit, one or more people who help administer ESEA, Title IV-C, and the person designated as the Committee on Evaluation and Information Systems (CEIS) representative.

At the LEA level, information is sought from the person with the responsibility for administering that district's special education program. Information is not sought from the campus or classroom levels. The BEH has taken the position that principals and teachers cannot be expected to interrupt school routines in order to discuss the kinds of information needed at the Federal level regarding the Statewide educational delivery system.

At the local level, on-site monitoring also involves a review of local level policies and/or procedures. A random check of handicapped children's confidential folders is normally done to ascertain that due process procedures have been followed in the testing and placement of children.

In the case of state-operated programs receiving P.L. 89-313 funds, the school program director is normally the person from whom information is solicited. This information is the same as that required from local levels.

BEH personnel also interview one or more members of each state's advisory panel hopefully including the chairperson of the panel.

Parent groups are another source of information regarding the educational opportunity afforded handicapped children in a particular state. Every attempt is made to get representatives from one or more parent groups to attend a meeting with BEH personnel.

(4) Selection of Sites to Be Monitored

In determining the states to receive Program Administrative Reviews, BEH selects approximately one-half of the states and territories for visits each year. With some exceptions, each state can therefore expect a review every other year.

The Program Administrative Review process utilizes two levels of data from local programs—those data collected through the distribution and return of questionnaires, and those data collected from interviews with school district and State operated program personnel. Therefore, two methods are used to select local level programs.

The first incorporates a random sampling technique that should yield approximately 3000 LEAs and state operated programs receiving questionnaires during each year's process. The numbers of LEAs and SOPs to participate in the questionnaire phase from each state can be seen by referring to Appendix B.

The second selection process is employed to determine a subsample of the LEAs and SOPs re-

ceiving questionnaires for on-site visits. Efforts are made to conduct a minimum of 10 LEA and 5 SOP on-site interviews in each State receiving Program Administrative Reviews.

The criteria utilized to select those SOPs and LEAs to be site-visited are as follows: size of LEA/SOP; rural, urban, suburban location; geographic dispersion; recipient of federal funds (89-313, EHA Part B, Early Childhood Incentive Grants); potential problem areas; potential exemplary practices; travel and time constraints; handicapping conditions served; the type of institution (residential or day school).

In the case of advisory panels, the BEH arranges to interview one or more representatives from the panel required by P.L. 94-142. Even though some SEAs utilize more than one advisory panel at the present time, it is only this one type of advisory group that is consistently in existence across all states.

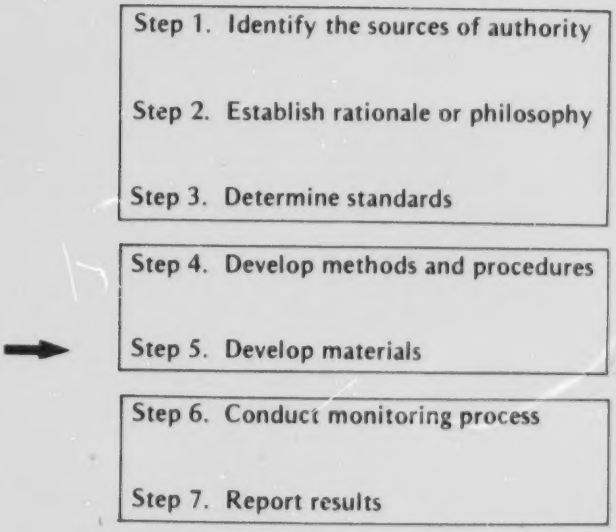
Parent Group Selection by BEH

The design implemented in FY 78 by BEH to select parent groups is intended to be flexible enough to meet the unique needs of each state scheduled for an Administrative Review. One of the following techniques for selection will be utilized, with determination made only after consultation with the State's Director of Special Education. While the responsibility for the final decision would have to rest with the BEH team chairperson, the objective of the consultation is to select the technique producing the most representative information from that State. The options are as follows:

1. Interview with one or more representatives from the State's coalition of parent groups, when such a coalition has been organized. Such a representative must be a parent of a handicapped child currently receiving special education and related services in a program within the State;
2. Interview with representatives of as many parent groups as respond to a general invitation;
3. Interviews with a random sample of the State's parent groups, with a minimum of six groups represented;
4. Interview with representatives of a "core" of parent groups, such "core" to be provided by Closer Look;
5. Interview with representatives of parent groups arbitrarily selected by BEH/SEA staff on the basis of:
    a. availability
    b. representatives
    c. size of membership
    d. relationship with SEA
    e. "track record" for involvement in Statewide procedures.

STEP 5:
Develop Materials

The efficiency and effectiveness of the monitoring process will depend heavily on the materials that are developed to guide both the management and data collection aspects of the system. The following checklist offers considerations in developing materials that will help meet these criteria. Examples of materials may be found in the Appendices.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Step 7. Report results

DEVELOPING MATERIALS—A CHECKLIST

__Have standard forms been established for each step of the monitoring process?
- contact letters
- worksheets
- data collection forms (e.g., questionnaire, checklist, interview)
- data summary sheets
- reporting forms

__Have forms been designed to meet specific data needs?

__Do forms include a reference to the authority for each question or statement?
- law
- rules and regulations
- policy
- guidelines

__Do forms reflect a consideration of the amount of structure needed by data collectors?
- peer monitors
- permanent SEA monitors
- third party monitors

__Do forms reflect a consideration of the amount of documentation needed for a particular purpose?
- funding
- applying sanctions
- technical assistance

__Have forms been designed for obtaining data from each identified source?
- different populations of individuals
- case studies
- records

__Have checklists of responsibilities and events been developed for coordinating the monitoring process at all levels?
- state coordinating responsibilities
- local coordinating responsibilities

FEDERAL MONITORING MATERIALS

The written materials developed by BEH to increase the probabilities of equality across time, States and agencies are designed to structure the Program Administrative Review process. They are made up of two questionnaires (one for LEAs and one for SOPs) and three Interview Guides (one for SEA personnel, one for advisory panel members, and one for parent groups). These materials structure the efforts and activities of the various teams and facilitate the documentation of findings, adding to the consistency and validity of conclusions reached by BEH team members regarding the statewide procedures and practices.

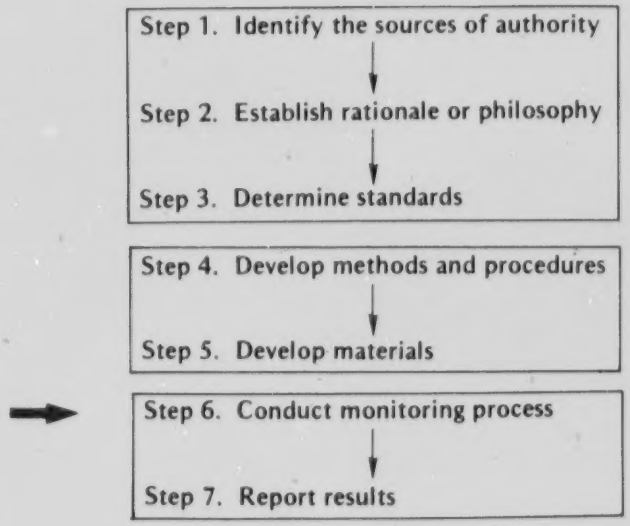
IMPLEMENTING THE COMPLIANCE MONITORING SYSTEM

STEP 6:

Conduct Monitoring

Successful implementation of the monitoring system depends on the planning and organization that precedes it, the data that is collected, and the interactions that occur between monitors and those being monitored during the implementation.

The following checklist is organized according to considerations needed at three distinct phases: (1) at the initiation of monitoring, (2) during the data collection, and (3) at the conclusion of monitoring. Within each phase, the checklist questions are subdivided into considerations relating to monitoring in general and those specifically related to on-site monitoring. Examples of different approaches to these questions may be found in the Appendices.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CONDUCTING MONITORING—A CHECKLIST

Initiation of Monitoring

General

__Have the major rules and regulations been reviewed?
__Have the data-gathering procedures been reviewed?
__Have previously collected data been reviewed?
__Have monitors been chosen and trained?
__Have monitors been scheduled?
__Are monitors aware of the standards and data collection procedures?

On-site

__Is a list of tasks available to each monitor?
__Has the system which is being monitored been prepared for the visit?
__Does each monitor have all of the materials that will be needed?
__Do monitors understand their role?

Data Collection

General

__Do data collection forms contain complete information?
__Is information on completed forms objective?
__Is information on completed forms supported by specific evidence?

On-site

__Have monitors used appropriate interviewing techniques?
__Have monitors interacted with site personnel in a non-threatening manner?
__Have monitors integrated their data-gathering procedures into the regular schedule of the school to as great an extent as possible?
__Have monitors respected the confidentiality of information obtained?

Conclusion of Monitoring

General

__Has a written statement of results been prepared according to the specified format, including verified documentation?
__Have areas of non-compliance been clearly identified?
__Have those monitored been provided a chance to reply to a preliminary monitoring report?
__Have follow-up procedures been specified?
__Has technical assistance been offered?

On-site

__Has a final interview been held with personnel in the monitoring system according to a specified format?
__Was supporting evidence offered for all statements?
__Have visited personnel been offered a chance to verify the information?
__Are follow-up procedures clearly specified?

Examples of sequences of events in the monitoring process may be found in the Appendices.

FEDERAL MONITORING PROCEDURE

BEH has found that it facilitates the Program Administrative Review process to give clear and early notice of the purposes, strategies, and other specifics of the monitoring to program managers. BEH notifies Chief State School Officers as soon as each year's schedule has been finalized -- hopefully before the beginning of the school year. Such notice briefly outlines the purpose of and authority for the Program Administrative Review process, the procedures to be utilized, personnel within the state to be involved, and the schedule to be followed. BEH considers it essential for the constructive aspects of the process that SEAs and other parties involved in the compliance monitoring process receive early and straightforward notice of such activities.

Pre-Visit Preparation

To minimize as much as possible the burden of all participants, a great deal of preparation is done before the site visit phase begins. This includes a thorough preview of APP provisions to gain a familiarity with the planned strategies, the resources committed, the personnel involved, the legislative basis for programming, and the other state specific contextural factors.

On-Site Procedures

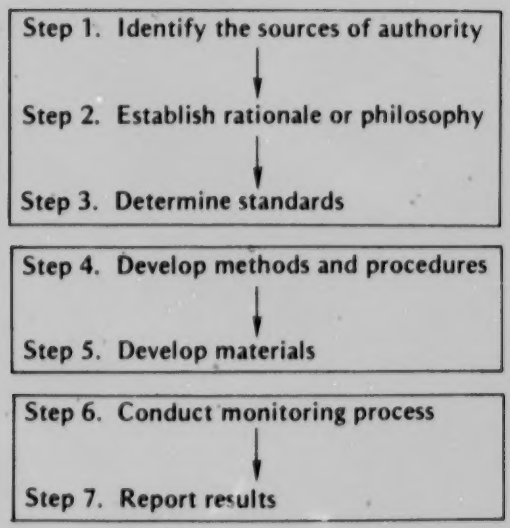
Typical Program Administrative Reviews are of five-day duration. At least four BEH staff members usually arrive in an SEA on Monday, participate in an orientation session with SEA staff members (selected by State Directors of Special Education), are teamed up with SEA personnel, and dispersed to conduct independent interviews by Monday afternoon. Normally, one SEA person accompanies one BEH person during each interview. This procedure facilitates entrance into agencies, provides SEA staff with fresh insights, and sets the stage for increased SEA/BEH communication and understanding.

Usually, after 3 - 3½ days of information gathering, BEH team members utilize Thursday afternoon in executive session to discuss findings and reach tentative conclusions regarding current state policies, procedures, and practices. The objective of this meeting is to reach a consensus as to the extent to which the state has implemented the provisions of PL 94-142 and PL 89-313 in a manner consistent with that state's APP. These provisions are considered programmatic variable by variable, as described in the BEH materials.

On Friday, BEH team members review the tentative findings and conclusions with SEA special education personnel to determine the extent to which BEH findings coincide with SEA special education personnel's judgments. After about two to three hours of this activity, an exit interview is held with BEH team members, Chief State School Officer (CSSO), and designated SEA staff. During this meeting, tentative findings and conclusions are shared with CSSO. Also, a brief description of the week's activities are reviewed for the benefit of the CSSO. Finally, the reporting procedures are explained, and the on-site visit is terminated.

STEP 7:

Report the Results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The events involved in using monitoring results comprise the final step of the monitoring process. At this point, the purpose of monitoring again becomes a primary concern. The checklist for this section reflects this focus.

REPORTING RESULTS—A CHECKLIST

Summarizing and Analyzing Information

__Has the information collected been summarized into a useful format?
- frequency counts
- percentages
- rates of growth
- priority rankings

__Has the information collected been stored for efficient future use?
- easy retrieval
- available to those who need it
- concise format

__Has the summarized data been analyzed in terms of the standards established?
- Has present status been compared to ideal status for each standard?
- If a percentage of compliance is useful, has this been computed?

The Written Report

__Does the format for the written report contain information useful for both compliance and improvements?
- commendations
- problems
- recommendations
- sources of evidence
- compliance needs
- technical assistance needs
- local responsibility

__Does the report differentiate between compliance and recommended change?

__Are all statements concerning compliance deficiencies clearly supported by documented evidence?

__Does the procedure for submitting the written report include protection of the program being monitored?
- chance to respond to preliminary report
- inclusion of response in final report

Feedback

__Is the responsibility for giving feedback to the monitored program clearly specified?
- on-site team
- team chairperson
- SEA staff member

__Is the format for feedback clearly specified and related to the written report?

Follow-up

__Has a timeline been established for follow-up events?
- feedback to system
- response
- written reports
- technical assistance
- sanctions

__Have the purposes of follow-up been clearly identified?
- verify data
- further sampling
- measure changes
- assure compliance

__Have follow-up techniques for each purpose been identified?
- telephone
- letter
- examination of written documents
- visit

__Has a procedure been established for correcting deficiencies?

__Have procedures for appeals and hearings been clearly outlined and made known to the monitored system?

Sanctions

__Are stated compliance needs related directly to an authorization?
__Are direct violations clearly labeled and well-documented?
__Have procedures for meeting compliance standards without the use of sanctions been clearly specified?
__Have the consequences of non-compliance been determined?
- LEA required to prepare correction plan
- SEA or regional office required to provide technical assistance
- funds withheld or withdrawn
- district or school accreditation modified or removed

__Are procedures for using different sanctions specified?
- withdrawal of funding
- elimination of program
- removal of accreditation

Feedback into the system

__Have procedures been established for utilizing monitoring information for improvement of the total system?
- training needs
- dissemination needs
- change in standards
- new procedures
- new materials

FEDERAL REPORTING

Within one to two weeks after the site visit, the BEH team drafts a report of the Program Administrative Review. This report must conform to an adopted format which:

(a) Cites the federal authority which justifies BEH expectations,

(b) Describes the policies, procedures, and practices found during the week of the visit,

(c) Describes any corrective actions to be implemented by the SEA to bring the state into compliance with Federal statutes and regulations, and

(d) Spells out the timelines during which the changes must be accomplished for each programmatic variable under consideration.

This draft is then reviewed by a BEH committee, and transmitted to the CSSO as quickly as possible. The SEA is given a two-week period to react to the draft report. After that period, and considering any reactions supplied by the SEA, a final report is written, reviewed, and issued to the CSSO. At that point, the contents of the Program Administrative Review report become public information.

Follow-Up Activities

In order to ascertain that all corrective actions required as a result of the Program Administrative Review have been implemented within the time frames provided, certain follow-up activities are utilized by BEH. In many cases, evidence of corrective actions implemented may be provided via phone and/or mail. In other cases, follow-up on-site visits may be conducted.

THINGS TO THINK ABOUT

Self-Check for System Developers

Figure 2 provides a self-check format for tracking progress in the development of a total monitoring system.

While monitoring processes eventually will be integrated across content areas, developers within any SEA or LEA may be at different stages of growth in each identified content area. The checklist may be used to profile the stages of development of the different elements of the system.

		STAGES						
		Identify Authority	Establish Rationale	Determine Standards	Develop Method and Procedures	Prepare Materials	Implement Monitoring	Issue Report
	IEP							
Examples of Content Areas	Due process							
	Staff development							
	Program delivery							
	Public communication							
	Physical facilities							
	Transportation							
	Core evaluation (etc.)							

Figure 2: Self-check format for system developers

Anticipating Unanticipated Consequences

Several common problems may confront education agencies in their planning and implementation of a monitoring system. Some of these are outlined below, with their possible causes and with suggestions that may help minimize their potential negative impact.

Avoiding Duplication of Effort

Collecting data for monitoring is a time-consuming process that affects both the monitors and those being monitored. As a result, it is quite possible for personnel to feel that monitoring detracts from their ability to perform their primary roles. It is, therefore, essential that every effort be made to avoid duplication of effort. Some suggestions that might be considered are:

a) Be aware of all other monitoring activities being conducted (e.g., finance, Title I, IV, instruction, certification, property, vocational education);

b) Determine whether other monitoring activities will affect special education monitoring;

c) Determine whether other program components already monitor some aspects of special education programs (e.g., transportation, fiscal, facilities, child count);

d) Develop procedures for reducing duplication and sharing data with other units;

e) Develop procedures for collecting and utilizing data across levels (LEA/SEA; SEA/Federal),

f) Determine if or how notice of program deficiencies will be used by other audit units (e.g., legislative auditors, executive branch auditors, U.S. Office of Education auditors, Office of Civil Rights auditors).

Morale of Monitoring Staff

Several state education agencies initiating monitoring of local education agencies have found that considerable adjustment in the attitudes and expec-

tations of the monitoring staff is necessary. Monitoring planners should be prepared to consider the following:

a) Monitoring should be seen as an assistance tool; a unit or an individual may have to provide both technical assistance and monitoring, a dual role which some individuals find quite difficult;

b) The time required to conduct monitoring is often underestimated due to unrealistic scheduling, other job responsibilities, etc. Priorities will need to be set with an understanding that monitoring is a legitimate and useful endeavor;

c) Staff morale may be lowered if staff members are not involved in developing and implementing the process and procedures for monitoring. Staff involvement is an excellent tool for achieving a commitment to monitoring;

d) The monitoring system may need a procedure for dealing with staff members who are uncomfortable in the monitoring role. An evaluation of staff interests and capabilities may be necessary, with reassignments as needed to avoid dissension within the monitoring system.

Staff Behavior and Protocol

The behavior of monitors has been found to affect their acceptance by the system being monitored. The following points should be made in briefing on-site monitors:

a) Monitors should recognize the impact of the logistical problems they can cause on the monitored system; they should be prompt, interview at the least disruptive time, and in general try to foresee and to alleviate any possible negative effects;

b) Monitors should be aware that they are the guests of the monitored system, and should observe standards of courtesy by checking in with the building principal, thanking staff for their cooperation, etc.;

c) Monitors should not make judgments or give advice during the process of interviewing and collecting data.

Objectivity of Monitoring Information

Monitors should seek to be as objective as possible, refraining from making judgments about the monitored system or allowing past experiences with the system to bias their collection of data. The following guidelines are suggested:

a) Monitors should be trained in proper techniques for collecting data for reporting purposes;

b) Monitors should be expected to document sources of information on monitoring forms;

c) Monitors should list evidence for each judgment,

d) Multiple sources of examples of any one problem situation should be required before any conclusion is made.

Parent Involvement

Parents are often included in plans for the monitoring as a source of monitoring information. Monitoring systems may have difficulty in obtaining sufficient and appropriate representation of parents, and in assuring the objectivity of data provided by parents. The following are suggestions to minimize these problems:

a) Select parents for individual interviews based on random sampling;

b) Invite parent organization members to a group meeting to explain the purposes and processes of monitoring, and possibly to collect input;

c) Utilize district parent advisory committees,

d) Utilize data obtained from parent complaints to SEA and/or LEA.

State Administrative Structures

The administrative structure of a state may not be conducive to the most efficient and effective use of monitoring procedures. When adding or expanding the monitoring function, therefore, the SEA should review the current organizational structure to determine whether modifications are needed. The following should be considered:

a) Size and location of the central office staff,

b) Availability of regional or other decentralized staff,

c) Number of local systems to be monitored,

d) Number of LEA directors or supervisors of special education,

e) Support of top SEA staff for monitoring.

Monitoring Programs in Other Agencies

In those states which receive federal funding for any educational program, it is the responsibility of the SEA to monitor the education of all handicapped children, regardless of whether or not that education is being provided through the SEA. Thus, special educational programs within institutions, private residential facilities, and other agencies must also be monitored. The logistical problems resulting from this responsibility are enormous. It is essential that the SEA consider the following points:

a) The applicability of standards and procedures to each of these educational programs;

b) A definition of the exceptions that will be accepted from each educational program;

c) Alternative arrangements that may facilitate such monitoring (e.g., interagency agreements, joint writing of documents),

d) Possible sources of authority for monitoring such programs (e.g., accreditation standards).

APPENDIX

EXAMPLES FROM THE STATES

1. IDENTIFICATION OF EXCEPTIONAL STUDENTS
SUMMARY

Individual _____
Committee _____

Monitor _____
Chairperson _____

	YES	NO	N/A
PUBLIC AWARENESS			
*1. Does the district have documentation/examples of its efforts to create public awareness of special education opportunities? (C&S 1.01b) Comments:	–	–	–
*2. Is the information regarding the rights of handicapped children made available in a language and in phrases which will be understandable regardless of ethnic, linguistic, or cultural background? (C&S 1.01a) Comments:	–	–	–
*3. Does the district have procedures for location, identification and referral of handicapped children who are not in school or who do not have access to a special education program? (C&S 1.02a; P.L. 94-142 612 (2) (A)) Comments:	–	–	–
*4. Does the district have procedures for making an appropriate program available to these children? (C&S 1.02a) Comments:	–	–	–
5. Are staff members and parents aware of the special education opportunities in their district? Comments:	–	–	–
IDENTIFICATION			
*6. Has the district established and disseminated to school personnel written procedures for identifying exceptional children who require special education? (C&S 2.01) Comments:	–	–	–
*7. Do the identification procedures include academic progress, visual, hearing, communication, emotional, psychomotor problems and reading skills? (C&S 2.02) Comments:	–	–	–

	YES	NO	N/A
*8. Are individual evaluation procedures excluded from the identification system? (C&S 2.02) Comments:	–	–	–
*9. Is vision and hearing screening in accordance with the Department of Health Services hearing and vision screening program? (C&S 2.02) Comments:	–	–	–
*10. Are the district adopted identification procedures completed within 45 calendar days after enrollment for each kindergarten and new student enrolled without records? (C&S 2.03) Comments:	–	–	–
*11. Are the names of children with a possible handicap submitted to the administrator for referral for evaluation or other appropriate services? (C&S 2.04) Comments:	–	–	–
*12. Is the documentation of the identification procedures utilized, the date(s) and the results maintained in the child's placement folder? (C&S 2.05) Comments:	–	–	–
*13. Is the primary language of the home and the child determined and noted on the pupil record? (C&S 2.06) Comments:	–	–	–
*14. Is all communication in the primary language of the home? (C&S 2.06) Comments:	–	–	–
15. Are all staff members aware of the identification procedures established by the district? Comments:	–	–	–

	YES	NO	N/A
*16. May parents, guardians and students request a referral for evaluation? (C&S 3.02, 3.03) Comments:	–	–	–
17. Are all staff members aware of the district referral system? Comments:	–	–	–
18. Do staff members feel that the district referral system is useful? Comments:	–	–	–
EVALUATION			
*19. Is written consent of the parent or guardian obtained prior to the evaluation? (C&S 4.01) Comments:	–	–	–
*20. Are all required evaluation components conducted during the evaluation process? (C&S 4.01, 4.02) Comments:	–	–	–
*21. Do the evaluation reports include all sections required in Conditions and Standards? (C&S 4.01c) Comments:	–	–	–
*22. Do gifted children demonstrate achievements or potential ability in one or more of the areas listed in Conditions & Standards 4.06? (C&S 4.06b) Comments:	–	–	–
*23. Are all evaluations conducted by appropriately certified or licensed personnel? (C&S 4.01, 4.02) Comments:	–	–	–

	YES	NO	N/A
Are the evaluation results used by special and regular personnel to develop the child's educational program? Comments:	–	–	–

*Compliance areas

STRENGTHS:

SUGGESTIONS FOR PROGRAM IMPROVEMENT:

2. PLACEMENT PROCESS
SUMMARY

Individual _____ Monitor _____
Committee _____ Chairperson _____

MULTIDISCIPLINARY PLACEMENT COMMITTEE	YES	NO	N/A
*1. Are all required persons included in multidisciplinary placement conferences? (C&S 5.01a i-vi) Comments:	–	–	–
a. Are all required persons contacted or present in mini-conferences? (C&S 5.01a vii) Comments:	–	–	–
*2. Is written notice sent to the home prior to any conference? (C&S 5.01c) Comments:	–	–	–
*3. Has written indication from the parents been obtained when they do not wish to participate in the conference? (C&S 5.01a v) Comments:	–	–	–
*4. Is there a multidisciplinary conference report for all children placed in special education? (C&S 5.03) Comments:	–	–	–
*5. Does the multidisciplinary conference report include the results of the evaluation, eligibility for special education placement and proposed alternative programs? (C&S 5.02) Comments:	–	–	–
*6. Are parents or guardians informed of their rights at the conference: C&S 5.02) Comments:	–	–	–

	YES	NO	N/A
*7. Is eligibility for special education placement determined among those persons involved in the multidisciplinary conference, other than the parents? (C&S 5.04) Comments:	–	–	–
*8. Are handicapped children educated in the regular class unless the nature or severity of the handicap is such that education in regular classes, even with the use of supplementary aids and services, cannot be accomplished satisfactorily? (C&S 5.05a) Comments:	–	–	–
*9. Do all personnel providing special education programs or services meet the standards for certification or other endorsement established by the State Board of Education? (C&S 5.05b) Comments:	–	–	–
*10. Have all parents or guardians indicated by signature (or on tape) on a form which is written in English and the language of the home understanding of the placement, parental rights, and agreement/disagreement concerning the proposed placement? (C&S 5.06) Comments:	–	–	–
*11 Is there written parental approval for all children who are placed or continued in a special education program? (C&S 5.07) Comments:	–	–	–
*12. Are the recommended programs and services provided no later than 90 school days following authorization? (C&S 5.08) Comments:	–	–	–
a. Are the parents or guardians of the child and the Department of Education notified when placement is delayed for more than 90 school days? (C&S 5.08) Comments:	–	–	–

	YES	NO	N/A
13. Are all staff members aware of the procedures for participating in multidisciplinary placement conferences? Comments:	–	–	–
14. Are all staff members attending multidisciplinary placement conferences given an opportunity to express their opinion concerning the proposed placement? Comments:	–	–	–
INDIVIDUALIZED EDUCATION PROGRAM			
*15. Is an individualized education program developed or revised for every handicapped child as soon as practicable after the beginning of the school year or after the child's placement? (C&S 5.09) Comments:	–	–	–
*16. Does the individualized planning conference include a representative of the school district, the child's teacher(s), one or both parents, and where appropriate, the child? (C&S 5.09) Comments:	–	–	–
*17. Are all required components included in the individualized education program? (C&S 5.08) Comments:	–	–	–
18. Are staff members aware of procedures for developing IEPs? Comments:	–	–	–
19. Do staff members feel that the district IEP procedure is useful? Comments:	–	–	–
REVIEW OF PLACEMENT			

	YES	NO	N/A
*20. Are the placement and educational development of each special education child reviewed once each semester? (C&S 6.01a) Comments:	–	–	–
*21. Is a copy of the results of the review submitted to the parent or guardian of the child? (C&S 6.01a) Comments:	–	–	–
or *22. Does reevaluation occur every three years/as necessary to determine continued placement or termination of special education services? (C&S 6.01b) Comments:	–	–	--
*23. Is there a formal review prior to continuation or change in special education placement? (C&S 6.03) Comments:	–	–	–
*24. Has the district established procedures for communicating the results of the placement review to parents? (C&S 6.03) Comments:	–	–	–
*25. Is there parent consent for continuation or change of placement? (C&S 6.03) Comments:	–	–	–
*26. Is there a complete review of a child's educational status prior to termination of special education programs and services? (C&S 6.04) Comments:	–	–	–
27. Are staff members and parents aware of district review of placement procedures? Comments:			

PLACEMENT (page 5)

	YES	NO	N/A
28. Are staff members who are involved with the student consulted in the review of placement process? Comments:	–	–	–
PUPIL-TEACHER RATIO			
*29. Does the district have a policy with regard to allowable pupil-teacher ratios and pupil-staff ratios for provision of special education services? (ARS 15-1015a 5) Comments:	–	–	–
30. Is the district pupil-teacher and pupil-staff ratio being implemented? Comments:	–	–	–
DUE PROCESS			
*31. Has the district established and submitted to the Division of Special Education policies and procedures concerning:			
a. Impartial due process hearings;			
b. Confidentiality and access to student records? (C&S Appendix) Comments:	–	–	–

*Compliance areas

STRENGTHS:

SUGGESTIONS FOR PROGRAM IMPROVEMENT:

3. ALTERNATIVE PROGRAMS
SUMMARY

Individual _____
Committee _____

Monitor _____
Chairperson _____

	YES	NO	N/
PRIVATE SCHOOL PLACEMENT			
*1. Does the school district in which a voucher child is placed review the educational progress and integrate the student into the public school as soon as possible? (ARS 15-1029 .04) Comments:	–	–	–
*2. Does the school district notify the Division of Special Education of additions to the approved private school contract? (Contract for Services with Private Schools) Comments:	–	–	–
3. Does the district have a procedure for including private school personnel in placement, IEP, and review of placement procedures? Comments:	–	–	–
*4. Has the district established procedures for evaluation of the private school program? (C&S 8.13) Comments:	–	–	–
*5. Have procedures been established for returning students to the public school program? (C&S5.05a) Comments:	–	–	–
REGULAR CLASSROOM			
6. Are regular education programs in the district appropriate for all of the special education students participating? Comments:	–	–	–

ALTERNATIVE PROGRAMS (page 2)

	YES	NO	N/A
7. Are adequate support services available for special education students participating in regular classrooms? Comments:	–	–	–
8. Is there coordination/planning among all staff providing services to the exceptional student? Comments:	–	–	–
9. Is there a district procedure for determining the academic and behavioral progress of the exceptional student? Comments:	–	–	–
WORK EXPERIENCE			
*10. Is each student enrolled in a special education work-experience program at least 16 years of age? (C&S 7.01) Comments:	–	–	–
*11. Has each student enrolled in a special education work-experience program been given a vocational evaluation which specifically assesses aptitudes, interests, and special needs in relation to job placement? (C&S 7.02) Comments:	–	–	–
*12 Has a vocational plan been developed for each student which includes the goals of the work-experience program, the provision of an adjusted curriculum, and supervised job placement in relation to the abilities and needs of the individual student? (C&S 7.03) Comments:	–	–	–
*13. Is the handicapped student provided with a full-time instructional program if employment is not available or is terminated? (C&S 7.04) Comments:	–	–	–

ALTERNATIVE PROGRAMS (page 3)

	YES	NO	N/A
*14. Is evaluation, training and part-time employment under the supervision of certified school personnel? (ARS 15-1015 D) Comments:	–	–	–

*Compliance areas

STRENGTHS:

SUGGESTIONS FOR PROGRAM IMPROVEMENT:

4. FACILITIES
SUMMARY

Individual _____
Committee _____

Monitor _____
Chairperson _____

	YES	NO	N/A
1. If special education students are housed separate from regular school facilities are these facilities equal to or better than the regular education classes in the district? (ARS 15-1015B) Comments:	–	–	–
2. Are all district facilities adequate for providing services to the special education student? Comments:	–	–	–

STRENGTHS:

SUGGESTIONS FOR PROGRAM IMPROVEMENT:

5. PARENT INVOLVEMENT
SUMMARY

Individual _____
Committee _____

Monitor _____
Chairperson _____

	YES	NO	N/A
1. Does the district have an operational parent advisory committee for special education? Comments:	–	–	–
2. Does the district have procedures which encourage parent involvement in the special Education program? Comments:	–	–	–

STRENGTHS:

SUGGESTIONS FOR PROGRAM IMPROVEMENT:

6. P.L. 94-142 REQUIREMENTS
SUMMARY

Individual _____
Committee _____

Monitor _____
Chairperson _____

PROCEDURAL SAFEGUARDS
DUE PROCESS PROCEDURES FOR PARENTS AND CHILDREN

	YES	NO	N/A
*1. Are the parents of a handicapped child afforded an opportunity to examine all records with respect to the identification, evaluation, and educational placement of the child and the provision of a free appropriate public education to the child? (Reg. Sec. 121a.402(a) (b)) Comments:	–	–	–
*2. Has written notice been given to the parents of a handicapped child a reasonable time before the district (1) proposes to initiate or change the identification, evaluation, or educational placement of the child or the free appropriate public education provided to the child; (2) refuses to initiate or change the identification, evaluation, or educational placement of the child or the free appropriate public education provided to the child? (Reg. Sec. 121a.(404) (1) (2)) Comments:	–	–	–
*3. Does the notice sent to parents include:			
(a) A full explanation of all of the procedural safeguards available to the parents?	–	–	–
(b) A description of the action proposed or refused by the agency, an explanation of why the agency proposes or refuses to take the action, and a description of any options the agency considered and the reasons why those options were rejected?	–	–	–
(c) A description of each evaluation procedure, test, record, or report the agency uses as a basis for the proposal or refusal?	–	–	–
(d) A description of any other factors which are relevant to the agency's proposal or refusal?	–	–	–
(Reg. Sec. 121a.(405)) Comments:			

	YES	NO	N/A
*4. Is the notice written in language understandable to the general public? (Reg. Sec. 121a (405)) Comments:	–	–	–
*5. If a hearing has been conducted by the district, was the hearing officer: (1) not an employee of the State or local educational agency who is involved in the education or care of the child; (2) not a person having a personal or professional interest which would conflict with his or her objectivity in the hearing. (Reg. Sec. 121a.407) Comments:	–	–	–
*6. During the pending of any administrative or judicial proceeding regarding a complaint, unless the district and the parents of the child agree otherwise, has the child remained in his or her present educational placement? (Reg. Sec.121a.413) Comments:	–	–	–
*7. If the complaint involves an application for initial admission to public school, with the consent of the parents, has the child been placed in the public school program until the completion of all of the proceedings? (Reg. Sec. 121a.413) Comments:	–	–	–
PROTECTION IN EVALUATION PROCEDURES			
*8. Has an evaluation been conducted before any action is taken with respect to: (1) the initial placement or denial of placement of a handicapped child in a special education program, or (2) the transfer or denial of transfer of a child from a special education program to full-time regular class placement? (Reg. Sec. 121a.431) Comments:	–	–	–
*9. Have tests and other evaluation materials been validated for the specific purpose for which they are used and are/they recommended by their producer for that purpose. (Reg. Sec. 121a432(a)(2)(3)) Comments:	–	–	–

	YES	NO	N/A
*10. In test selection and administration, if a test is administered to a child with impaired sensory, manual or speaking skills, do the test results accurately reflect the child's aptitude or achievement level or whatever other factor the test purports to measure, rather than reflecting the child's impaired sensory, manual, or speaking skills (except where those skills are the factors which the test purports to measure)? (Reg. Sec. 121a.432(d)) Comments:	–	–	–
*11. Do the alternate placements include instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions? (Reg. Sec. 121a.441(b)(1)) Comments:	–	–	–
*12. To the extent necessary to implement an individualized education program for each handicapped child, has the district made provisions for all of the various alternative placements? (Reg. Sec. 121a442(2)(b)) Comments:	–	–	–
*13. Unless a handicapped child's individualized education program requires some other arrangement, is the child educated in the school which he or she would attend if not handicapped? (Reg. Sec. 121a.442(2)(c) Comments:	–	–	–
*14. In selecting the least restrictive environment, is consideration given to any potential harmful effect on the child or on the quality of services which he or she needs? (Reg. Sec. 121a/442(2)(d)) Comments:	–	–	–
CONFIDENTIALITY OF INFORMATION			
*15. Does the district keep a record of parties obtaining access to information collected, maintained, or used (except access by parents and authorized employees of the district) including the name of the party, the date access was given, and the purpose for which the party is authorized to use the information. (Reg. Sec. 121a 453) Comments:	–	–	–

	YES	NO	N/A
*16. Is parental consent obtained before personally identifiable information is disclosed to anyone other than officials of participating agencies collecting or using the information? (Reg. Sec. 121a.461) Comments:	–	–	–
*17. Does the district protect the confidentiality of information at collection, storage, disclosure, and destruction stages? (Reg. Sec. 121a462(a)) Comments:	–	–	–
*18. Does one official at each district assume responsibility for insuring the confidentiality of any personally identifiable information? (Reg. Sec. 121a.462 (b)) Comments:	–	–	–
*19. Have persons collecting or using personally identifiable information received training or instruction regarding the State's policies and procedures? (Reg. Sec. 121a.462) Comments:	–	–	–
*20. Does the district maintain for public inspection, a current listing of the names of those employees within the district who may have access to personally identifiable information? (Reg. Sec. 121a.462) Comments:	–	–	–
*21. Is all personally identifiable information collected, maintained, or used destroyed within five years after the information is no longer needed to provide educational services to the child excepting a permanent record of a student's name, address and phone number, his or her grades, attendance record, classes attended, grade level completed, and year completed? (Reg. Sec. 121a.463(a)) Comments:	–	–	–
*22. Before destruction of data, have reasonable efforts been made to notify parents that they have the right to a copy of any information which has been collected, maintained, or used? (Reg. Sec. 121a.463(b)) Comments:	–	–	–

	YES	NO	N/A
FULL EDUCATIONAL OPPORTUNITY GOAL			
*23. Is the district taking steps to insure that handicapped children have available to them the variety of programs and services available to non-handicapped children including art, music, industrial arts, home economics, and vocational education? (Reg. Sec. 121a202(a)) Comments:	–	–	–
*24. Is the district providing non-academic and extracurricular services and activities in such manner as is necessary to afford handicapped children an equal opportunity for participation in those services and activities? (Reg. Sec. 121a202(b)) Comments:	–	–	–
PHYSICAL EDUCATION			
*25. Is physical education made available to every handicapped child receiving a free appropriate public education? (Reg. Sec. 121a.203(a)) Comments:	–	–	–
*26. Has the district responsible for the education of a handicapped child who is enrolled in a separate facility, or who is unable to participate in the regular physical education program, taken steps to insure that physical education provided to the child is comparable to services provided to non-handicapped children? (Reg. Sec. 121a.203) Comments:	–	–	–
INDIVIDUALIZED EDUCATION PROGRAMS			
*27. Has the district taken steps to insure that one or both of the parents of the handicapped child are present at each meeting or are afforded the opportunity to participate, including scheduling the meeting at a mutually agreed on time and place? (Reg. Sec. 121a.224(b)) Comments:	–	–	–
*28. If neither parent can attend the meeting, has the district used other methods to insure parent participation, including individual or conference telephone calls? (Reg. Sec. 121a.224(b)) Comments:	–	–	–

	YES	NO	N/A
*29. If the district is unable to convince the parents that they should attend the meeting, does the district have a record of its attempts to arrange a mutually agreed upon time and place? (Reg. Sec. 121a.224(c)) Comments:	–	–	–
*30. Has the district taken whatever action is necessary to insure that the parent understands the proceedings at a meeting, including arranging for an interpreter for parents who are deaf or whose native language is other than English? (Reg. Sec. 121a.224(d)) Comments:	–	–	–
*31. Does the IEP include a list of the individuals who are responsible for implementation of the individualized education program? (Reg. Sec. 121a.225) Comments:	–	–	–

*Compliance areas

STRENGTHS:

SUGGESTIONS FOR PROGRAM IMPROVEMENT:

RECORDS SEARCH
(Combination of General and Psych. Services form)

REVIEWER _____ LOCATION: _____

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
REFERRAL				
1. Initial student referral on file				
a.) Check date of referral for child study, date of psychological report, date of case conference (should be within 60 days)				
b.) Initiated by whom (teacher, parent, agency etc.) - name and title				
2. Does the referral Specify those questions to which the school psychologist/psychometrist is to respond? i.e., are reasons stated and are behaviours specified which seemingly interfere with child's academic and/or social growth?				
3. What is the documentation that parents of a pupil referred for individual tests have been fully informed of the reasons for the referral?				
4. Is there documentation that the initial referral information was presented to the parents in a personal interview? How is this documented?				
5. If not, was the referral information presented by mail (permissive)?				
6. Does the referral indicate prior attempts for remediation and the outcome?				

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
7. Does the date of parent permission precede the date of test administration?				
8. Is there a signed parental consent form for individual psychological testing?				
9. Does the consent for testing indicate: a. purpose				
b. procedures (testing, observation, interview)				
c. what the testing may include if appropriate i.e., intelligence, personal & social adjustment, educational readiness, academic achievement and sensory/perceptual motor functioning				
10. Is a time limit specified for the permission form or is blanket permission given?				
11. Can parental concerns be noted on the form?				
12. Does the form have space for parents to decline and withhold their consent?				
CASE CONFERENCE 13. How are parents and appropriate school personnel notified of the meeting?				
14. Is a case conference report on file?				
15. Date of meeting (60 days from referral)				

56

57

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
16. Individuals in attendance (titles)				
17. Recommendations and reasons specified in report				
18. Date report forwarded to superintendent or his designee (within 20 days)				
SUPERINTENDENT'S REPORT 19. Registered mail receipt (as verification the report has been sent)				
20. Is this the same (or different) report as the case conference committee's report?				
21. Is the superintendent's report sent even when a special education placement is NOT recommended?				
22. Analysis: ___ a.) a detailed description of proposed action (placement, denial of placement, transfer)				
___ b.) specific and complete reasons for the proposed action;				
___ c.) specification of any tests or reports upon which the proposed action is based;				
___ d.) a description of any alternative educational opportunities available on a temporary or permanent basis;				

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
___ e.) notification that the parent or guardian may obtain independent medical, psychological, and educational evaluations for their child;				
___ f.) a listing of the name, address, and telephone number of any appropriate local diagnostic center(s);				
___ g.) information about any organizations providing assistance with respect to placement questions;				
___ h.) notification of the parents or guardians right upon written request to a hearing before an independent Hearing Officer if they object to the proposed placement;				
___ i.) the manner in which the parents or guardians may request such a hearing;				
___ j.) the parents or guardians right to be represented at the hearing by legal counsel;				
___ k.) their right to examine and copy their child's school records (including any tests or reports upon which the proposed action may be based) at any time during regular office hours;				
___ l.) their right to present evidence including expert medical psychological and educational testimony; and				
___ m.) their right to confront and cross-examine any school official, employee, or agent of the school district or public department who may have evidence upon which the proposed action is based.				

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
PARENT PERMISSION				
23. Has written permission of the parent or guardian been obtained before their child is assigned to a special education program?				
24. Is informed (written) consent on file from parents whose children are receiving medicines during school hours?				
STUDENT ELIGIBILITY				
25. Homeobund - evaluation by a physician (8 weeks minimum non-attendance); evidence of academic information.				
26. Learning Disabilities - physician's written report from an individual evaluation establishing pupil's eligibility				
27. Emotional Disturbance - written report from an individual evaluation by a certificated school psychologist, or physician, a clinical psychologist determining appropriate placement				
28. Hearing Impaired - written report correlating information from: (a) audiological evaluation by a clinicial audiologist;				
(b) general medical examination;				
(c) otological examination by an otologist;				
(d) evaluation of learning capabilities.				

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
29. Visually Impaired - Medical report and evaluation of learning capabilities				
30. Medical, psychological, and other reports pertaining to the placement of students in special education are conducted every three (3) years or less				
ANNUAL REVIEWS 31. Annual case review report available				
32. Dated				
33. Persons in attendance (titles)				
34. Format of report (brief description)				
35. Is there documentation of how parents were notified and scheduled?				
36. Can you determine what follow-up provisions were made for parents who do not attend the annual review meeting?				
INDIVIDUAL EDUCATIONAL PLAN (IEP) 37. Has an IEP been developed by the case conference committee for students placed in special education programs?				
38. If so, is the IEP a specific response to the referral questions, the data collected, and the data shared at the case conference?				

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
39. What is the format of the IEP? Does it consist of a series of general goal statements with desired outcome behaviors?				
40. Can you determine from the files whether the IEP process primarily leaves the development of specific behavioral objectives and the timetable to the receiving special education teacher?				
41. Can you determine from the files how the IEP's are utilized for each student in the special education program?				
PSYCHOMETRIC DATA ANALYSIS 42. Intellectual functioning — are the results of the child study summated and reported as a single abilities score? If yes, then this is violation of Rule S-1				
43. Academic achievement				
44. Sensory and perceptive motor functioning				
45. Health/Developmental history				
46. Educational history				
47. Socio-cultural data				
48. What do the recommendations indicate? (Should not specify placement - this is responsibility of Case Conference Committee.)				

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
CONTRACTED PSYCHOLOGICAL SERVICES (may need to consult the Director) 49. Does the contract indicate that the basis for payment are set in units of time? (not on per pupil basis)				
50. Does the contract indicate that the units are spread throughout the school year by some general schedule?				
51. Is the contracted examiner certificated as a: a. school psychologist b. school psychometrist c. clinical psychologist holding private practice license d. clinical psychologist with basic certification license and is under the supervision of private practice license holder e. psychiatrist f. other (specify)				
INTERNSHIP 52. If there is a school psychology/psychometry intern, is he/she under the supervision of a certificated school psychologist or psychometrist who has had at least three years experience and sixty hours of graduate education?				
53. How has the training institution declared the school psychology student ready for the internship experience?				

STANDARD	DOCUMENTATION	YES	NO	COMMENTS
54. Statistics (may need to consult the Director) a. Number of full-time certified school psychologists?				
b. Number of full-time certified school psychometrists?				
c. Number of part-time psychologists?				
d. Number of part-time psychometrists?				
e. Number of interns?				
f. Total school district enrollment?				
g. Ratio of school psychologists/psychometrists to school population				

GDC/cm
Revised 2/4/77

STAFF DEVELOPMENT

Overall Goal:	Determine the approvals, supervision and professional development of special education staff

Specific Criteria:

☐ 1. Job descriptions with clear statements of roles and responsibilities have been developed and circulated for all special education staff.

☐ 2. All special education staff have proper certification and approvals for the students they serve. (502.10cc), (005.0,1006.0)

☐ 3. All special education staff are supervised and evaluated on a regular basis at least once a year

☐ 4. Thorough orientation on 766 procedures is provided to all new staff.

☐ 5. Professional growth is encouraged through incentives such as credit, stipends, or released time for workshops, conferences, participation in Program Audits, etc.

☐ 6. Good communication exists and is encouraged among all staff at all levels.

☐ 7. Administrative organization facilitates effective implementation of 766:

- ☐ a. Full time special education administrator for student population over 3,000. (200.0)
- ☐ b. Organization and programs are non-categorical (G.L. C.766,S.1)
- ☐ c. Clearly defined lines of authority and communication

☐ 8. Comprehensive plan exists for special education in-service training for both regular and special education staff. (501.2(c), 610.3)

☐ 9. Adequate level of funding exists for special education in-service training.

PUBLIC COMMUNICATION

Overall Goal:	Determine the scope and effectiveness of communication with the public concerning Chapter

Specific Criteria:

- ☐ 1. Annual or more frequent community-wide communication such as informal meetings, workshops and print materials are provided for parents and community members concerning 766 programs and procedures. (304.2,6)
- ☐ 2. On-going public information articles and programs in local media are provided. (304.5)
- ☐ 3. Notices to parents of students in need of special services regarding their rights and 766 procedures are clear, non-legalistic and written in primary language of the home. (203.0)
- ☐ 4. Outreach program for 16 - 21 year olds out of school is in operation. (206.0)
- ☐ 5. Parent and professional involvement is encouraged through an Advisory Committee or other organized group.

SERVICES FOR THREE AND FOUR YEAR OLDS

Overall goal:	Determine extent to which required services for three and four year olds are provided.

Specific Criteria:

- ☐ 1. Thorough identification procedures are employed using many sources e.g. census, media, pediatricians, community agencies, letters to parents, etc. (304.0)
- ☐ 2. Appropriate staff used for screening who are experienced and/or trained in working with three and four year olds. (602.2)
- ☐ 3. Well designed screening instrument which includes all required areas is used (600.5,306.0)
- ☐ 4. Staff was involved in selection or development of screening instrument and trained in its use.
- ☐ 5. Standards for referral have been established. (601.0)
- ☐ 6. Vision and Hearing testing complies with Department of Public Health regulations. (600.5,306.3,.4)
- ☐ 7. Results of screening are shared with parents. (602.4)
- ☐ 8. Specialists appropriate to student's needs e.g. vision, speech, etc. serve on CET. (604.0)
- ☐ 9. Core Evaluation is completed within 30 school working days of referral. (319.0)
- ☐ 10. All program prototypes and services required by educational plans are provided. (608.0)
- ☐ 11. Services are provided by appropriately trained staff who are experienced and/or trained in working with 3 and 4 year olds. (610.2,.5)
- ☐ 12. Good communication and parent involvement is encouraged and parent help provided e.g. training, locating support services. (610.1)
- ☐ 13. Annual or more frequent orientation workshops for parents are held. (304.2)
- ☐ 14. School system makes use of collaboratives and community agencies e.g. Head Start, Day Care, etc. to provide appropriate services. (608.2,3.4)
- ☐ 15. There is good communication between pre-school sending and kindergarten receiving teachers.

KINDERGARTEN SCREENING

Overall Goal:	Determine whether required screening procedures and follow-up are provided for Kindergarten children.

Specific Criteria:

☐ 1. Kindergarten staff was involved in selection or development of screening instrument and trained in its use.

☐ 2. Standardized, system-wide screening instrument is used which includes all required areas: vision, hearing, language, visual-auditory-motor functioning, separately and in integration, developmental history. (306.0)

☐ 3. Standards for referral have been established.

☐ 4. Kindergarten staff are involved in the screening process.

☐ 5. Appropriate specialists (speech, etc.) are involved in the screening process. (305.0)

☐ 6. Referrals for Core Evaluation are being made and completed as a result of screening in all cases where appropriate. (307.3)

☐ 7. Results of screening are shared with:
- parents
- receiving kindergarten teachers (307.0)

☐ 8. There is on-going screening of late entering kindergarten students. (308.0)

☐ 9. Organization of screening process provides:
- positive experience for child and parent
- screening in neighborhood school whenever possible

☐ 10. Follow-up efforts are made to reach known but non-registered children. (304.7.8.9)

CORE EVALUATION

Overall goal:	Determine the structure and effectiveness of the process for referral and evaluation of students in need of special services.

Specific Criteria:

☐ 1. Effective procedure is in place to ensure modifications to regular programs are tried before referral for core evaluation. This procedure utilizes the appropriate regular education support services e.g. reading, counseling, etc. (314.0)

☐ 2. Well defined referral and core evaluation procedures have been developed and communicated to staff.

☐ 3. System-wide procedure for administration and regular supervision of core process is in operation.

☐ 4. Comprehensive, efficient record-keeping and filing system for special education is in place.

☐ 5. Up-to-date log of referrals is maintained.

☐ 6. Parent requests for core evaluation are carried out without delay. (317.0,319.0)

☐ 7. Parent is notified within 5 days that referral has been made for core evaluation. (317.0)

☐ 8. All assessments are performed by qualified, licensed professionals. (320.0,312.0)

☐ 9. Core evaluation teams include specialists appropriate to student's area(s) of need, e.g. vision specialist, vocational educator, etc. (312.0,320.6)

☐ 10. Full cores have been done for all 502.3 to 502.6 prototypes. (319.1(b))

☐ 11. All required assessments for full cores are done. (320.0)

☐ 12. Core Chairperson's role is shared to reduce burden on anyone staff member or group of staff members e.g. using speech clinicians to chair intermediate cores when speech is the only need.

- ☐ 13. CET meetings are scheduled at regular times when least disruptive to instructional program.
- ☐ 14. CET meetings are well organized and run, neither longer nor shorter than necessary.
- ☐ 15. CET Chairperson(s) encourage full participation of all members especially parents and students 14 years or older.
- ☐ 16. A translator is present when necessary. (203.0)
- ☐ 17. Receiving teachers, especially regular class teachers, participate in development of the educational plan. (311.8)
- ☐ 18. Educational plans include all information required by regulations including liaison person. (321.0)
- ☐ 19. Core Evaluation is completed within 30 school working days of referral. (319.0)
- ☐ 20. Educational plans are submitted to parents for approval within 10 school working days. (324.0)
- ☐ 21. Out-of district placements are approved by the Regional Office in Consultation with Regional Review Board (504.2(b),.3(b))
- ☐ 22. Core reviews and re-evaluations are conducted when appropriate. (332.0)
- ☐ 23. CET is reconvened when major change in education plans is being considered. (332.0,333.0.334.0)
- ☐ 24. Educational plans are distributed among or made accessible to all teachers working with students.
- ☐ 25. Serious consideration for referral is given to all students, particularly at middle and high school levels, who are (1) failing in two or more non-elective courses (2) in danger of not being promoted (3) suspended for more than 5 days within a quarter. (314.1,.2,.3)
- ☐ 26. All students receiving special education services have signed educational plans. (300.0,302.0)
- ☐ 27. Every effort is made to maintain confidentiality during core process. (G.L.c.71B, s.3,P 17)

PROGRAM DELIVERY

Overall Goal:	Determine the extent to which students' needs are being met by school district's special education programs.

☐ 1. Complete register of children in need of special services is kept with all required information (300.0)

☐ 2. There is little or no delay between approval of educational plans and placement of student in program. (329.0)

☐ 3. All students are receiving the services called for in their educational plans.

☐ 4. Special education services are not being used in place of regular support services e.g. reading, counseling, etc.

☐ 5. Age range of students in substantially separate class does not exceed three years. (502.4(a)(iii))

☐ 6. All staff working with students have a copy of or access to the educational plan.

☐ 7. Educational plans are used to program for a student and to monitor progress. (332.1)

☐ 8. Written quarterly progress reports are sent to parents and a copy is filed. (337.1(a))

☐ 9. There is regular communication among various staff working with same child to coordinate program, share materials and ideas. etc.

☐ 10. Support services to students (speech, counseling, etc.) are adequate. (503.1)

☐ 11. Support services to teachers (Diagnostic/Prescriptive Teacher, substitutes, aides, etc.) are adequate. (502.1(b)(1),.2,.3)

☐ 12. Materials and equipement are adequate (321.2(c),4(f))

☐ 13 Caseload of students assigned to teachers and specialists is neither under nor over the number they can effectively serve.

☐ 14. Substantially separate class has no more than
8 students without an aide
12 students with an aide (502.4(a)(ii))

☐ 15. Aides are trained and supervised by teacher.

☐ 16. Special need students are integrated with regular program wherever possible (321.3)

☐ 17. Substantially separate class receives services of regular education specialists (music, art, gym, etc.) (321.5(f)).

☐ 18. All program prototypes required by educational plans are available at each school. (502.0)

☐ 19. Resource Rooms are non-categorical and neither over nor under-utilized.

☐ 20. There is adequate coordination of program planning as student moves between levels (elementary, middle, high school) between schools and/or between prototypes.

☐ 21. Program alternatives are available for students 16 - 21 years old. (502.11)

☐ 22. Programs are available for students returning from:
Day & residential programs
Home & hospital programs
Institutional Schools

☐ 23. There is regular communication to monitor progress of students in:
Day & residential programs
Home & Hospital programs
Institutional Schools
Collaborative programs (337.1)

☐ 24. The following are provided for secondary special needs students:
work/study programs
counseling services
access to vocational-technical school (503.1(a))

PHYSICAL FACILITIES

Overall Goal:	Determine whether the facilities used for delivering special services are appropriate.

Specific Criteria:

☐ 1. Special education instructional areas, including intinerant are placed in areas which facilitate integration with regular students. (508.2)

☐ 2. Special education classes are well-distributed throughout the system. (508.2)

☐ 3. Special education instruction areas are at least equal to those for regular education. (508.1)

☐ 4. At least one building at each level (elementary, middle, high school) is accessible to mobility impaired students e.g. ramps, elevators, wide doors, etc. where necessary (508.3)

☐ 5. Instructional areas are:
- well maintained
- attractive
- free of auditory and visual distractions from outside

☐ 6. Instructional areas have adequate:
- space
- light
- ventilation
- acoustics
- temperature control

TRANSPORTATION

Overall Goal:	Determine whether appropriate transportation is provided for students with special needs.

Specific Criteria:

- ☐ 1. School system goes to bid on all transportation in excess of $2000.
- ☐ 2. There is a well-developed set of bid specifications.
- ☐ 3. Transportation requirements are specified in student's educational plan. (902.0)
- ☐ 4. School system collaborates with surrounding communities whenever possible for out-of-district transportation.
- ☐ 5. There is designated individual with responsibility for special needs transportation.
- ☐ 6. School system uses most cost-effective method of transport consonant with student's needs.
- ☐ 7. In-service training for drivers, both general and specific to individual children, is provided. (905.3)
- ☐ 8. Attendants are assigned to any vehicles with three and four year olds or any child with behavior problem that would distract driver. (905.4)
- ☐ 9. No child is transported continuously for more than one hour without parental permission. (905.2)
- ☐ 10. Vehicle appropriate to each child's needs is provided (900.0)
- ☐ 11. No child is left unattended in a vehicle.
- ☐ 12. There is a trained assistant designated for each non-ambulatory student. (905.7)
- ☐ 13. Drills are conducted for emergency evacuation of vehicles.
- ☐ 14. Special needs transportation is provided for field trips and after-school activities.
- ☐ 15. Reimbursement for parents who arrange to transport their own child is made at prevailing rate for state employees. (12¢ mile) (903.0)
- ☐ 16. Unannounced spotchecks of special needs transportation equipment are made at least monthly. (905.6)

FINANCE

Overall Goal:	Determine adequacy and appropriateness of special education funding and budgetary processes (G.L. c375)

Specific Criteria:

☐ 1. Maintains separate Special Education budget with accurate, current accounts recorded by proper object and function code.

☐ 2. Maintains running monthly or more frequent balances which are available to appropriate personnel.

☐ 3. Provides for unanticipated expenses; e.g. emergency private placement.

☐ 4. Makes maximum effort to apply for Federal funds available for Special Education services.

☐ 5. Has budget process which incorporates input from line staff.

☐ 6. Has assumed cost of good programs which were previously Federally funded.

☐ 7. Belongs to collaborative(s), or other cooperative arrangements for cost effective service delivery.

☐ 8. Utilizes third party payments for Special Education services whenever possible.

☐ 9. Makes full and proper claim for all allowable state reimbursements.

☐ 10. Closely coordinates financial accounting and maintenance of state aid funds with municipal finance officers.

☐ 11. School Committee appropriates sufficient funds to provide services called for in educational plans.

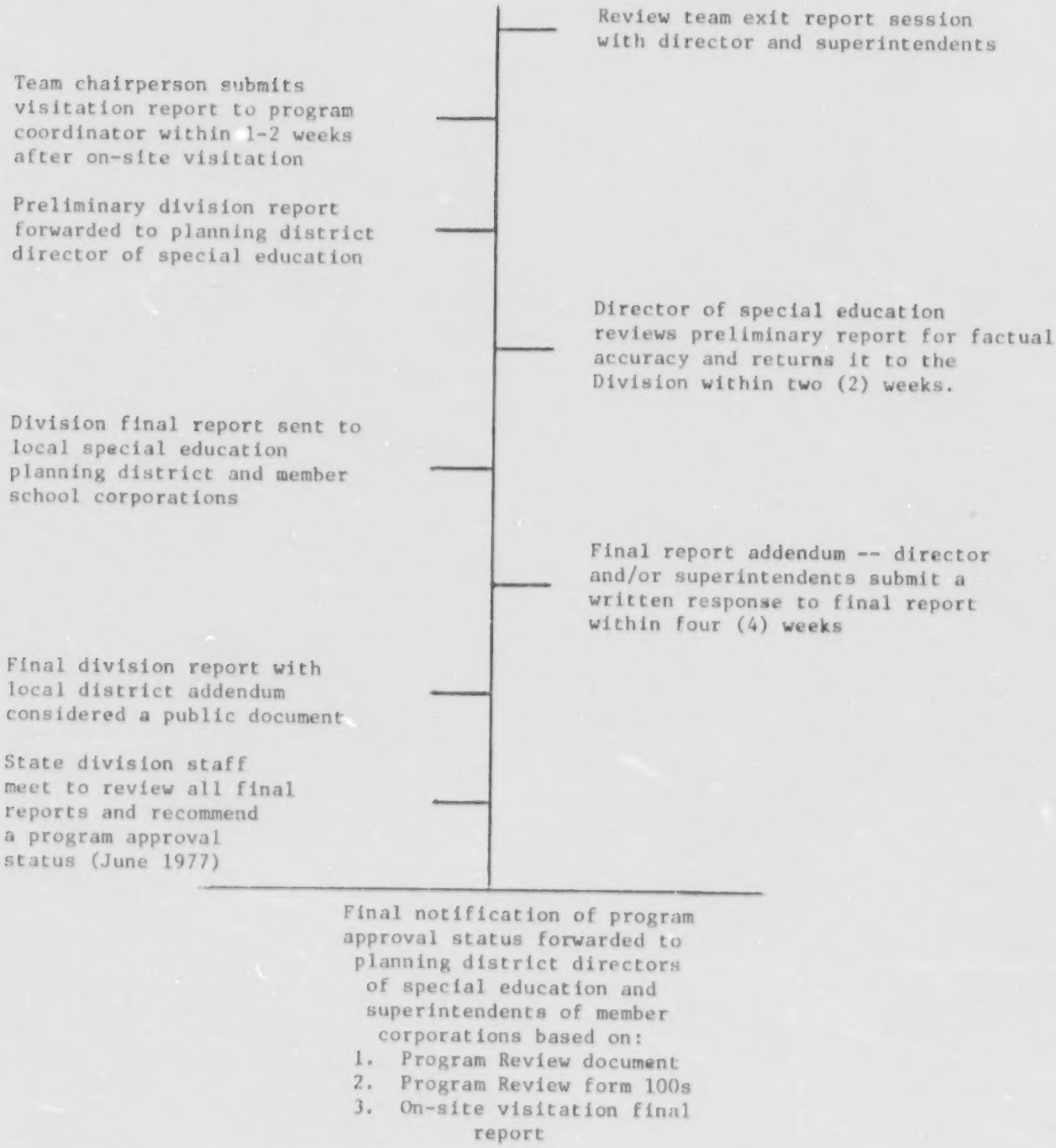
Program Review
LINE OF EVENTS

HOUSE CONCURRENT RESOLUTION 37

(February 1976)

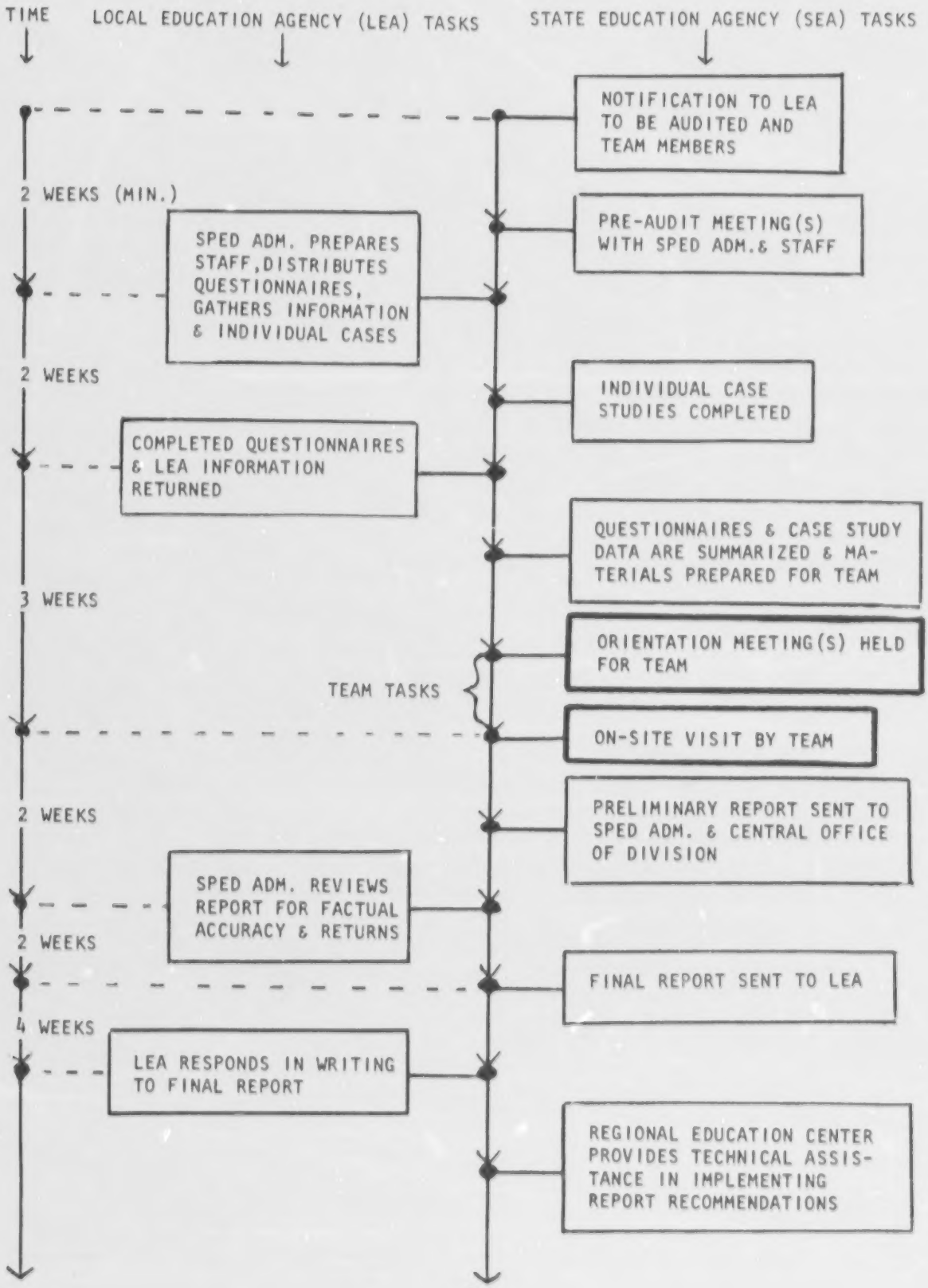
STATE
LOCAL
Program Review (PR) Document -- Final draft printed (September 1976)
Self-review phase -- PR document completed by all school corporations and/or special education planning districts (October 1976)
Legislative Progress Report submitted (November 1976)
Statistical report and computer print-out update -- PR 100 forms completed (November 1976)
Selection of 24 special education planning districts for on-site visitations during Spring 1977 semester
On-site visitation notification to selected planning district directors of special education and superintendents of member corporations (December 1976)
Request for volunteer directors as team members (December 1976)
Regional consultant and team chairperson meet with local director of special education to prepare visitation schedule, select student records, and leave questionnaires.
Director of special education distributes questionnaires to the following groups for completion prior to on-site visitation:
1. psychometrists
2. principals
3. regular class teachers
4. special education teachers
5. speech clinicians
On-site visitation includes the following components:
1. staff and administrator interviews
2. review of questionnaires
3. parent conference

Line of Events
(cont.)


Review team exit report session with director and superintendents
Team chairperson submits visitation report to program coordinator within 1-2 weeks after on-site visitation
Preliminary division report forwarded to planning district director of special education
Director of special education reviews preliminary report for factual accuracy and returns it to the Division within two (2) weeks.
Division final report sent to local special education planning district and member school corporations
Final report addendum -- director and/or superintendents submit a written response to final report within four (4) weeks
Final division report with local district addendum considered a public document
State division staff meet to review all final reports and recommend a program approval status (June 1977)
Final notification of program approval status forwarded to planning district directors of special education and superintendents of member corporations based on:
1. Program Review document
2. Program Review form 100s
3. On-site visitation final report

GDC/cm
3/1/77

AUDIT PROCESS TIME LINE


TIME
LOCAL EDUCATION AGENCY (LEA) TASKS
STATE EDUCATION AGENCY (SEA) TASKS
NOTIFICATION TO LEA TO BE AUDITED AND TEAM MEMBERS
2 WEEKS (MIN.)
PRE-AUDIT MEETING(S) WITH SPED ADM.& STAFF
SPED ADM. PREPARES STAFF,DISTRIBUTES QUESTIONNAIRES, GATHERS INFORMATION & INDIVIDUAL CASES
2 WEEKS
INDIVIDUAL CASE STUDIES COMPLETED
COMPLETED QUESTIONNAIRES & LEA INFORMATION RETURNED
QUESTIONNAIRES & CASE STUDY DATA ARE SUMMARIZED & MATERIALS PREPARED FOR TEAM
3 WEEKS
ORIENTATION MEETING(S) HELD FOR TEAM
TEAM TASKS
ON-SITE VISIT BY TEAM
2 WEEKS
PRELIMINARY REPORT SENT TO SPED ADM. & CENTRAL OFFICE OF DIVISION
SPED ADM. REVIEWS REPORT FOR FACTUAL ACCURACY & RETURNS
2 WEEKS
FINAL REPORT SENT TO LEA
4 WEEKS
LEA RESPONDS IN WRITING TO FINAL REPORT
REGIONAL EDUCATION CENTER PROVIDES TECHNICAL ASSISTANCE IN IMPLEMENTING REPORT RECOMMENDATIONS

Bureau for Education of the Handicapped Sampling Procedure

The Program Administrative Review process involves the collection of data at two levels. At the first level, brief questionnaires sent to a random sample of LEAs and state operated programs are the principal means of data collection, while the second level utilizes the structured interviews. At both levels, a sample of the total population is specified as sources of data.

Sampling for Questionnaire Distribution

The federal procedure for estimating the number of LEAs to be sampled is based on an established system utilized by the National Center for Educational Statistics (NCES). A sufficient sample size is needed to provide reasonable state estimates; an estimate of possible responses therefore is the first step. If it were possible to go to all districts, the exact percentage of possible responses could be determined. However, because it is not feasible to survey all districts, questionnaires are sent to a sample, causing the percentage in the sample to vary from the percentage of responses in the whole state.

The differences between the sample and statewide responses depend upon the sample size, the variation of responses, the degree of confidence required, and the bounds of confidence. On the basis of how the data are utilized and NCES procedures, BEH has assumed that a .95% confidence level is suitable and that the sample percentage must be within 1 .10 of the state percentage. Given these specifications, the sample size is com-

puted for each state and provided by computer print out programmed for such a sampling procedure.

This sampling procedure is further refined for utilization by BEH through the addition of two "rules of thumb", also used by NCES to insure the largest possible representation of children served in the random sample. These two rules of thumb are:

1. In all states, the larger programs must be included in the sample. "Larger" is operationalized by dividing the number of school-age children served in these programs in the state by the sample size. This figure provides a cut-off point for large/small LEAs. All districts serving more children than this figure are sampled, and the remaining programs are randomly sampled;
2. All LEAs in each state serving fewer than 600 children are eliminated from the sample except those states where these districts serve more than 33% of the children in that state.

This methodology produces the following state specific information:

State	# Of Districts	Sample Size	Large Districts (Size)
Alabama	125	56	13,513
Alaska	13	12	7,067
Arizona	119	55	8,573
Arkansas	185	66	6,275
California	576	86	52,713
Colorado	87	47	11,683
Connecticut	136	58	11,125
Delaware	24	20	6,500
D.C.	1	1	130,000
Florida	67	40	4,393
Georgia	182	65	15,619
Hawaii	1	1	178,000
Idaho	64	40	4,393
Illinois	810	90	23,947
Indiana	285	75	15,234
Iowa	268	74	7,817
Kansas	165	63	6,583
Kentucky	167	63	11,023
Louisiana	66	40	20,550
Maine	105	52	4,785
Maryland	24	20	44,400
Massachusetts	274	74	15,941
Michigan	470	83	23,351
Michigan	470	83	23,351
Minnesota	273	74	11,544
Mississippi	149	61	8,291
Missouri	261	73	12,614
Montana	49	34	4,533
Nebraska	77	44	6,455
Nevada	14	13	10,462
New Hampshire	68	41	3,937
New Jersey	408	81	17,738
New Mexico	54	36	7,495
New York	613	87	38,868
North Carolina	148	60	19,350
North Dakota	27	22	4,637
Ohio	595	86	26,568
Oklahoma	180	65	8,350
Oregon	123	56	7,865
Pennsylvania	501	84	26,442
Rhode Island	36	27	6,571
South Carolina	91	48	12,613
South Dakota	62	39	3,418
Tennessee	135	58	14,983
Texas	552	85	31,113
Utah	34	26	11,712
Vermont	47	33	2,697
Virginia	128	57	18,822
Washington	167	63	12,110
West Virginia	55	36	10,834
Wisconsin	331	77	12,354
Wyoming	33	25	3,332

The statistical formula utilized for the sample derivation for state operated programs is the same as that utilized for LEAs. The level of confidence and variations between the sample responses and entire state responses will be identical to those resulting from the sampling of LEAs. However, due to different characteristics of the SOPs, a different "rule of thumb" must be utilized to assure that the sample is representative of the type and size of programs existing in each state.

It is critical that at least one program serving each type of handicapping condition stipulated in P.L. 89-313, (MR, ED, Deaf, Hard of Hearing, Visually Handicapped, Crippled, and other Health Impaired) be included in the sample. Also, it is assumed necessary that the largest program serving children in each category in the sample be included. "Largest" is defined as the program serving the most children. On the basis of this criteria, each state sample must include the program which serves the largest number of handicapped children in each of the categories, (Hard of Hearing, Visually Handicapped, Crippled and Other Health Impaired).

This method of sampling, when applied to the most recent data available, produces the following sample sizes:

Total Number of State Operated
and State Supported (In-State) Schools
P.L. 89-313

State	# of Schools	# to be Sampled
Alabama	12	11
Alaska	145	60
Arizona	8	8
Arkansas	80	45
California	26	21
Colorado	27	22
Connecticut	56	37
Delaware	19	17
D.C.	68	41
Florida	87	47
Georgia	14	13
Hawaii	14	13
Idaho	3	3
Illinois	110	53
Indiana	88	48
Iowa	10	10
Kansas	47	33
Kentucky	22	19
Louisiana	115	54
Maine	33	25
Maryland	40	29
Massachusetts	358	79
Michigan	80	45
Minnesota	3	3
Mississippi	9	9
Missouri	86	47
Montana	4	4
Nebraska	6	6
Nevada	19	17
New Hampshire	10	10
New Jersey	705	88
New Mexico	7	7
New York	247	72
North Carolina	116	54
North Dakota	4	4
Ohio	101	51
Oklahoma	10	10
Oregon	61	39
Pennsylvania	170	64
Rhode Island	10	10
South Carolina	6	6
South Dakota	19	17
Tennessee	13	12
Texas	70	42
Utah	5	5
Vermont	39	29
Virginia	156	62
Washington	36	27
West Virginia	14	13
Wisconsin	55	36
Wyoming	18	16

ANY LETTER TO A SCHOOL COMMITTEE SHOULD BE INDIVIDUALLY TYPED, ADDRESSED TO THE CHAIRPERSON BY NAME, AND SENT FROM CENTRAL OFFICE.

Letter to School Committee

Dear _____,

The Department of Education is required, under Chapter of the Acts of 1972, to monitor special education programs in local school districts.

Each year, the Division of Special Education conducts a comprehensive audit in a number of school systems throughout the state. The _____ Public Schools have been selected by the Division for a Program Audit. The process will begin with the next two months.

The audit includes: a self-evaluation questionnaire administered to your staff; a study of individual cases by the Division; an on-site visit by a team of educators from other school systems, a parent of a child with special needs, and Division staff; a final report submitted to the school committee; and assistance in responding to the recommendations in the report. You will be receiving a questionnaire for school committee members with the suggestion that you may want to meet with an audit team member. Your input would be valuable and we encourage you to participate in the process.

You will receive the final report within a few weeks of the on-site visit. A written response to the report is required, particularly where there may be areas of non-compliance.

We hope that the report will be positive, will offer good recommendations, and will be seen as a planning document for the development of quality educational services for the children in your school district.

Sincerely,

Director
Bureau of Program Audit and
Assistance

cc: Superintendent
Director of Special Education
Regional Project Director

SAMPLE LETTER TO TEAM MEMBERS

Dear _____:

We are pleased that you will be a participant in the Chapter Program Audit for the (name of LEA) Public Schools scheduled for (dates).

Enclosed are some materials which will help explain the audit process and your responsibilities on the team. Please read them prior to the team orientation meeting. It will make the meeting much more meaningful to you.

The team orientation meeting will be held on (day), (date), at (place) from (time) to (time). The major purposes of the meeting are to further detail the audit process, to give you background information on the (name of LEA) Public Schools and to answer any questions you may have.

School visitations and team meetings will be scheduled from _____ a.m. to _____ p.m. Team members must be available at all times.

We are able to pay travel expenses at $ .12 per mile and overnight costs for late night meetings if your home is more than twenty-five miles from (name of town). You will also be given a meal allowance. If overnight arrangements will be needed, please let me know.

The program audit looks at certain major areas in the special education program and team members are assigned to sub-committees in those areas. We try to assign team members to the subject area in which they have a particular interest or expertise. Depending upon the size and complexion of the team, we may be able to assign you to your area of interest. If there is a particular sub-committee on which you would like to serve, please tear off the attached checklist and return it to me within the next couple of days.

We know that your participation on the Program Audit will be a worthwhile professional experience and we look forward to having you on the team.

Sincerely,

Chairperson
(Name of LEA) Program Audit Team

Please check area of interest or expertise for Program Audit sub-committee assignment.

_____ Staff Development	_____ Core Evaluation
_____ Public Communication	_____ Program Delivery
_____ Kindergarten Screening	_____ Physical Facilities
_____ Services for three and four year olds	

NAME _____

PHONE: _____ _____

OFFICE HOME

LETTER OF NOTIFICATION TO PARENTS

Dear _____ :

As you know, has a Special Education Law called Chapter . Since September 1974, this law has required that all children from three to twenty-one years old in need of special education services be given an education by their local school system, including those special services.

The Department of Education must make sure that local school systems are obeying this law. We now have a method of evaluating the program in local school systems. A team of people, including a parent of a special needs child, will be visiting your school system soon to conduct this evaluation. We will look at the Special Education Programs and talk to the teachers and administrators.

An important part of the evaluation is looking at the records of some children receiving special education services. We have chosen, at random, a number of records and your child's name was one of those chosen. We will be looking to see if your child's evaluation was done correctly and whether she/he is actually receiving the necessary program. No one will see these records other than Department of Education professional staff.

We would also like very much to talk with you during our visit to your school system. We are now trying to schedule meetings with parents and the parent member of our team. Basically, she/he will ask about your experience with in your child's school, if you have any complaints or if you think your child's program is good.

Enclosed is a form which will help us to schedule the interviews. We have also sent you a questionnaire. It would be most helpful if you would complete and return them both. We have provided a self-addressed, stamped envelope for your convenience.

The future of many children with special needs depends upon how well we can provide for their education today. Thank you so much for your help.

Sincerely,

Chairperson

C/efm

SAMPLE

PLEASE COMPLETE AND RETURN THIS FORM IN ENCLOSED ENVELOPE.

I would like to be interviewed:

☐ Individually

☐ With a group of other parents

☐ By telephone

The best day and time for me is:
(Check desired date and enter time. You will be contacted for verification of appointment.)

☐ _____ Time: _____

☐ _____ Time: _____

☐ _____ Time: _____

NAME _____

ADDRESS _____

TELEPHONE _____

On-site Visitation

CHECKLIST

Revision 1/20/77

____ 1. Personnel roster or list of staff by exceptionality area

____ 2. QUESTIONNAIRES to Director (Regional consultant)

____ a. Regular Class Teacher (distribute approximately 1 per every 4 regular class teachers across all grade levels). (Maximum 250 copies.) Forward to Principal for random distribution to 25% of his regular education teachers with cover memo from Director.

____ b. Special Education Teacher (distribute to all special education teachers).

____ c. Speech, Language and Hearing Clinicians (distribute to all therapists).

____ d. Psychologists (distribute to all)

____ e. Principals (distribute to all)

____ 3. Parent group interview (Schedule a small group which may be selected from an advisory group, community advocacy groups or agencies, etc.) Must be representative sampling of community consumer groups.

____ 4. Designate case conference coordinator(s) if other than director of special education and plan interviews and record searches accordingly.

____ 5. INTERVIEWS

____ a. Special Education Teachers - select one (1) of every five (5) by level and exceptionality; at least one (1) teacher per exceptionality area and level.

____ b. Principals - Interview one (1) of ten (10) principals in buildings where special education teachers are interviewed.

____ c. Psychologists - interview all psychologists in a group session of five (5) or less.

____ d. Speech Clinicians - interview all clinicians in a group session of five (5) (or individually) in a decentralized program. In a unit or centralized program, select one (1) of five (5) clinicians or a designated coordinator.

____ e. Supervisors (if applicable) - individually if possible

____ f. PT/OT (if applicable)

____ g. Title VI Projects - see H. Binder

____ 6. RECORDS - the local director is to have complete student files, as selected, available for the visitation team. Student file information is not limited to, but should include, class and school records, referrals, parent permissions, case conference reports, annual case reviews, and psychological reports.

____ 7. RECORD SEARCH - Prior to visitation randomly select from program or class rosters two (2) pupil names by categories (including homebound) with the following exceptions:

____ a. Select two (2) pupil files from <u>each</u> speech clinician's caseload list by the following priorities:

____ (1.) pupil file with a hearing, voice, neurological and/or physiological condition

____ (2.) second pupil file with an articulation, stuttering, or language condition

____ b. Selection of EMR pupil records should include two (2) files from <u>each</u> level of elementary (2), junior high (2), and high school (2).

____ 8. FORMS - sample packet of all relevant forms to be available for team members.

____ 9. Organizational chart for special education planning district.

____ 10. Map of planning district with program locations.

____ 11. Travel arrangements for on-site

____ a. number of cars needed

____ b. number of local district personnel available to transport team members

____ c. mileage - record miles between schools with addresses

____ 12. Team headquarters and necessary supplies

____ 13. Team arrival and planning session

____ 14. Overview session with district staff

____ 15. Exit Conference (generally a closed session with administrative staff).

____ 16. Motel arrangments for team members (if over 50 miles from). For double room arrangements have each person's receipt marked as a <u>single</u>, otherwise it will be necessary to have motel endorsement of state Form B-73 attached to reimbursement claims.

____ 17. Follow-up thank you letter to local director

____ 18. Central office (chairperson)

____ a. Pick up pending program approval (PR 100) list from M. Cassidy the afternoon of the working day before the on-site visitation.

____ b. Check out the completed PR Document(s) from central file.

____ c. Complete Cooperative Composite form (in PR document folder) prior to visitation.

____ d. Obtain Title VI project application and evaluation forms from H. Binder.

____ e. Review comprehensive plan.

____ f. Check with G. Ryan for any program waivers or exceptions.

____ g. Contact Division of School Inspection if district includes a special education center.

____ h. Interview forms.

____ i. Record search forms.

____ j. Student file access forms.

PROGRAM REVIEW
ON-SITE TEAM VISITATIONS

OVERVIEW

The Division of Special Education has the responsibility of approving and monitoring special education programs conducted within the public school systems of A process of approval and monitoring has been formalized in the form of the Special Education Program Review.

The focus of the on-site visitation will be the special education planning district, but the various administrative arrangments throughout the state will necessitate review of the majority of individual school corporations throughout the state. The local director of special education will be the contact person, however, and an integral part of the visitation process.

Although it is not our intent to conduct the review process only through examination of records and files, there are many such items of information team members might expect to be documented in a log, or by a completed form, or a copy of correspondence. Neither will the visitation review exhaust the consumer avenue of information. Because of time and personnel limitations team members will not be able to visit every classroom, or interview all personnel, or meet all parents and procedures will of necessity be selective throughout the process. The following are key considerations:

1. Program review team members will utilize Rule S-1 as the standard during on-site visitations.
2. Program review team members will verify information in the completed Program Review document(s) as being fairly presented.
3. Program review team members will endorse the district's practice and procedures as conforming to generally accepted principles consistent with the rules and regulations.

Visitation team members are not evaluating teachers or other staff members but are reviewing programs and services and the extent to which they have been implemented.

COMPONENTS

1. Record Search (see checklist) - is to include complete student files as randomly selected prior to the on-site visitation. The local director of special

education is to have the designated student files available for the review team. Student file information should include, but is not limited to, class and school records, referrals, parent permission forms, case conference reports, psychological data, and annual case reviews.

Team members should be cautious in assuming that a particular form or process does not exist even if there is no such evidence in the randomly reviewed student files. Family Educational Rights and Privacy Act procedures within a school district may necessitate team members signing an access log for student files. A State Division access form should be signed and inserted in each student file that is reviewed. Record search and access forms will be distributed by the chairperson at time of visitation.

2. Questionnaires (see checklist) - are to be forwarded by regional consultant for distribution from local director to designated personnel and collected prior to the on-site visitation. Forms are to be completed anonymously. Data may be reviewed and tabulated by local director of special education for his/her planning purposes. Completed questionnaires are to be available for review by team members at time of visitation. All completed questionnaires are to be filed in the state division office.

3. Interviews (see checklist) - are to be scheduled for selective personnel by team chairperson, regional consultant, and director of special education. Team members should be sensitive to making inappropriate comments, for example, in a teacher interview session based on information from a previous supervisor interview. Team chairperson will have interview forms for team members at time of visitation.

PROCESS

A. Administration and Supervision

Team chairman and director (or superintendent) should meet to discuss:

1. PR document and any pending PR 100 approvals
2. organization: programs and services

3. budget

   a.) reimbursements

   b.) transfer tuition

   c.) contracted services

4. transportation

5. facilities

B. Programs and Services

Team members to complete interview forms as assigned.

C. Parent Session

Team chairman and members if desirable to meet with consumer group as scheduled.

TEAM REPORT

A. Exit report to district personnel

1.) Team is not the approval granting group. The exit report is to be highlights of the final written report which will be forwarded to the local Director from the State Division of Special Education office.

2.) Although the team's exit verbal report is to be general, not detailed or personal, it must be to the point. The team cannot present a highly complimentary verbal report and then submit a critical written team report.

3.) The exit report is to provide immediate feedback and should include highlights of strengths and weaknesses by category headings in PR document.

B. Written team report

1.) The team report is to be forwarded to the program review coordinator within one week after the completion of the on-site visitation.

2.) Program coordinator will review the report with the state director.

3.) The written team report will be forwarded to the local director of special education to verify the accuracy of the team's observations and comments.

4.) Any noted discrepancy will be discussed with the team chairperson.

C. FINAL REPORT

1.) The final report will be a collective document based on the team's report.

2.) The final report will be forwarded to the superintendent(s) of the planning district with the requirement that a written reply to the report is expected.

3.) The school corporation(s) response to the final report is to be coordinated through the local director of special education.

4.) The local director of special education is to submit a written response to the state division director of collective comments and/or exceptions to the final report.

5.) The written response from the local director of special education will be attached as an addendum to the final report.

6.) The state director of special education will forward final notification of program approval status to the superintendent(s) based on:

a.) completed PR document

b.) approved PR 100's

c.) on-site visitation final report

D. Report requests

1.) Requests from individuals community agencies, or media for a copy of the Program Review document, on-site visitation final report, and other related information should be directed to the local director of special education.

2.) Should the local district deny a request for a copy of these public documents, a written request with a copy of the local district's denial should be forwarded to the Director of the State Division of Special Education.

3.) Upon review and approval of the request the information will be released with notification to the local director of speical education.

I. START PROCESS

START Activity	Prior to Visit	On-site Visit	Following Visit
1. START MONITORS ASSIGNED TO VISIT	4-6 wks		
2. PRE-MONITORING VISIT CONDUCTED BY DIVISION CONSULTANT	3-4 wks		
3. PACKET OF INFORMATION SENT TO MONITORS	2 wks		
4. ORIENTATION FOR MONITORS		Day 1	
5. STAFF INTERVIEWS AND RECORD REVIEW		Day 1,2	
6. DATA COLLECTED IS SUMMARIZED BY MONITORS		Day 2,3	
7. EXIT MEETING WITH SPECIAL EDUCATION ADMINISTRATOR		Day 3	
8. FINAL REPORT SENT TO DISTRICT AND MONITORS			1 month
9. ACTION PLAN TO CORRECT ANY NON-COMPLIANCE AREAS SUBMITTED			2 months
10. REVIEW AND APPROVAL OF ACTION PLAN			3 months
11. FOLLOW-UP VISIT CONDUCTED BY DIVISION CONSULTANT TO VERIFY IMPLEMENTATION OF ACTION PLAN			3-6 months

II. PRE-MONITORING PROCEDURES

A. PREPARING FOR THE VISIT

All preparations for the START visits will be handled by the Division of Special Education, office. This will include assigning monitors, preparing interview schedules and organizing materials for each visit.

Assignment of Monitors

Monitors will be assigned to START visits based upon the programs of the district being monitored. Only persons who have completed a one-day training session may be used as START monitors. Prior to each START visit, the district will be sent a list of monitors assigned for that visit. If there are difficulties with any of the persons assigned, the district may request that another monitor participate on that visit.

Scheduling

Activity Schedules will be prepared for all monitors, identifying activities and interviews for which they are responsible during the visit. In addition, a District Interview Schedule will be prepared which lists all personnel scheduled for interviews, the interview times and the monitors assigned to conduct the interviews. The Interview Schedule will be sent to the District no later than one week prior to the visit in order to allow time for district staff to be notified of interview times and for coordination with the office in case schedule changes are necessary.

Preparing Materials

A packet of materials will be prepared for each START monitor, to include the Monitor's Activity Schedule, a map of the district, interview forms, the Monitor's Handbook and any other information which would be helpful during the visit. START monitors are sent information concerning the district prior to the visit, if available.

B. PRE-MONITORING VISIT

Prior to the actual START visit, the Division consultant assigned to the district will conduct a pre-monitoring visit. The purpose of this visit is to provide technical assistance to the district Special Education Coordinator in preparing for the on-site visit, and to collect information concerning district special education procedures for the monitors' orientation meeting. The following activities should be completed during the pre-monitoring visit:

- .Meet with the Special Education Coordinator in order to review START procedures and activities. All information to be collected to verify compliance with state and federal regulations should be explained.
- .Meet with district staff to inform them of START procedures and activities.
- .Review 4-8 placement folders using the Placement Documentation Checklist.
- .Identify parents to be interviewed.
- .Arrange to have the Personnel Development Questionaire disseminated to district staff for completion prior to the on-site visit.

Following the pre-monitoring visit the consultant will complete the Pre monitoring Report and send it and all data collected during the visit to the office where it will be summarized and sent to the START Coordinator, prior to the on-site visit. The parents identified during the pre-monitoring visit will be sent a letter explaining the START process and telling them they may be called for an interview.

C. PRE-MONITORING DATA COLLECTION

The Division of Special Education, office will be responsible for collecting and summarizing certain information prior to the on-site visit. The purpose of this pre-monitoring data collection is to prepare for the monitors' orientation meeting and to facilitate the preparation of the Final Report.

The following information will be collected and summarized by the office:

.Special Education enrollment by category of handicap.

.Certification of Special Education staff.

.District procedures for identification and placement.

This information will be put in appropriate sections of the Final Report and sent to the START Coordinator before the on-site visit.

III. ON-SITE VISIT

An Education Program Specialist will be assigned as the coordinator for each START visit. Consultants assigned to districts will not serve as START Coordinators for their own districts. Responsibilities of START coordinators include conducting an orientation for monitors, participating in and coordinating the START visit, and writing the Final Report giving the findings and recommendations of the START monitors.

A. ORIENTATION FOR MONITORS

START Coordinators will be responsible for conducting a two-hour orientation for monitors on the first day of the visit. Components of the orientation include:

.a brief review of START procedures.

.an overview of district identification and placement procedures.

.an examination of district enrollment and certification data.

.a review of START activity schedules.

The major purpose of the orientation is to give monitors information concerning district special education policies and procedures which can be verified during interviews with district personnel.

B. START ACTIVITIES

Monitoring activities to be completed on-site include interviews with district staff, verification of placement documentation and verification of district policies. In addition, the START Coordinator will be conducting monitors' meetings each afternoon.

Interviewing

All compliance items to be verified during the START process are divided into major sections with specific points to be covered in each section. Interview forms have been developed to ensure that all points in each section are covered and that there is consistency in the questions asked to cover each point. Monitors should be encouraged to follow the interview form carefully, read the directions on the back of the form and take accurate notes of the responses.

In order to facilitate the summarization and report writing processes, interview time must be spent in data collection only. If the person being interviewed requests technical assistance, a note should be made of the request. The START Coordinator should forward all technical assistance requests to the Consultant assigned to the district following the visit.

Verification of Placement Documentation

The Placement Documentation Checklist is used to verify that the district is following all required identification and placement procedures. Prior to the visit, districts to be monitored will be given a list of placement documentation to be verified and will be asked to identify the location of all items. The START Coordinator will receive a copy of this list and will be responsible for verifying all items at the location identified by the district.

Verification of District Policies

Conditions and Standards and P.L. 94-142 require that the district establish certain policies concerning special education placement and programming. A list of these required policies will be provided to the district at the pre-monitoring visit. The START Coordinator will review the policies and verify that all requirements are met using the District Policy Checklist.

START Meetings

The START Coordinator will conduct a meeting for START monitors each afternoon of the visit. The purpose of these meetings is to discuss information gathered in interviews, to summarize data collected and to make necessary schedule changes.

C. SUMMARIZING

All data collected during the START visit is divided into six major sections:

1. The Identification Process
2. The Placement Process
3. Alternative Programs
4. Facilities
5. Parent Involvement
6. P.L. 94-142 Requirements

Each monitor will be assigned to a committee dealing with one or more of the major sections. It is the responsibility of the committee to summarize all data collected dealing with its assigned section. Summary forms, which list all questions covered in each major section, have been prepared to assist with this process. The Summary forms for each section are to completed by individual monitors first, then given to the appropriate committee. The committee will prepare a final Summary based upon the individual forms completed by the monitors.

In order to assist in completion of the Summary forms, all questions on the individual interview forms include a reference back to the appropriate item on the Summary (e.g. I-2 is the second item on the Identification of Exceptional Students Summary). Monitors should complete the Summary form after reviewing all interview questions dealing with a particular Summary item. For example: Item 15 on the Identification of Exceptional Students Summary asks:

15. Are all staff members aware of the district identification system?

YES	NO	NA

Evidence _____

_____

In order to verify this, a number of staff members (special education teacher, classroom teacher, administrator) are asked to describe the identification procedures established by the district. If, on reviewing the responses to that question, you determine that special education teachers and administrators, can describe the system but most classroom teachers cannot, you would complete the Summary item as follows:

15. Are all staff members aware of the district identification system?

YES	NO	NA
	X	

Evidence 7 of 10 classroom teachers interviewed couldn't describe the system.

At the end of each major section Summary is a place to list strengths and suggestions for program improvement identified in that section.

Monitors are responsible for completing all appropriate Summary forms and delivering them to the committees by the time specified on the Monitor's Activity Schedule.

D. DEVELOPING THE FINAL REPORT

The Final START Report is divided into five areas:

I. Program Description
II. Strengths
III. Suggestions for Program Improvement
IV. Personnel Development
V. Compliance with State and Federal Regulations

Following completion of the Committee Summaries, the monitoring team will begin developing the Final Report. The second, third and fifth areas can be developed by the monitors while the first and fourth areas are completed by the office.

Strengths and Suggestions for Program Improvement

All monitors will list strengths and suggestions for Program Improvement for each major section on the Individual Summary Forms. Each committee is then responsible for completing these sections of the Committee Summary based upon the items felt to be appropriate from the Individual Summary Forms. After all committees have finished this process they can be combined into the Strengths and Suggestions for Program Improvement sections of the Final Report format.

Areas identified in these sections should be related to the master questions on the Summary Forms. In most cases they should be items identified by a majority of the monitors. Be as specific as possible when writing these sections. For example:

NOT "There seemed to be many communication and coordination problems between special and regular education staff."

INSTEAD "Ten regular and special education teachers interviewed indicated that lack of communication and time for coordination interfered with services to special education students."

Compliance with State and Federal Regulations

Compliance items are identified on the Summary Sheets by an asterisk. All compliance items on the Committee Summary with a "No" answer must be included in this section of the Final Report. The "comments" section after each item should identify the reason the item was marked non-compliance and can be included under the "Finding" column of the Final Report. (e.g. - Parent permission for evaluation was not documented in 8% of the cases reviewed). The regulation is identified after each item on the Summary Sheet.

E. EXITING CONFERENCE

The START Coordinator is responsible for scheduling a meeting with the district Special Education Administrator and appropriate staff on the afternoon of the final day of the visit. The purpose of this conference is to review the major findings and recommendations of the monitoring team and to give the district staff an opportunity to respond before completion of the Final Report.

General Operational Procedures
for
Exceptional Student Program Audits

1. Approximately two weeks prior to the on-site audit, the Superintendent, Chairman of the School Board and Director of the Exceptional Student program will be notified in writing as to:

   a. the dates of the audit
   b. program auditor(s) assigned to perform the audit and
   c. the specific exceptional student program to be audited

2. After receipt of written notification, the Director of Exceptional Student programs will be contacted by the program auditor to establish a specific schedule for the audit work.

3. Upon entering the district, the program auditor will conduct an entrance interview with the Superintendent, Director of Exceptional Student programs and other district staff members if deemed appropriate. The purpose of the entrance interview will be to provide a general overview of the audit objectives, scope and procedures.

4. The program auditor will complete on-site audit tasks including interviews, observations and examination of personnel and individual student records. Personnel records are to be housed at the district office. Individual student records are to be maintained by the principal of the school which the student attends.

5. Upon completion of the on-site tasks, the program auditor will conduct an exit conference with the Superintendent and Director of the Exceptional Student programs and other district staff members if deemed appropriate. The purpose of the exit conference will be to provide general information regarding the audit and to receive any needed additional information.

6. Approximately four weeks after completion of the on-site audit tasks, a comprehensive report will be made in writing to the Superintendent and Director of Exceptional Student programs. The Exceptional Student Program Audit Report will detail the components of audit examination and present findings as to compliance/non-compliance within each component. Recommendations for consideration toward program improvement will be rendered and commendations will be made when appropriate.

Recommendations to reduce the weighted FTE generated by individual students to the appropriate basic weight will be made to the Coordinator, Department of Education Internal Auditing in the following instances:

I. Classification of student - there is not sufficient diagnostic data to support the classification of the student as "exceptional".

II. Placement of student - there is not sufficient evidence that placement procedures were followed. Minimum placement procedures include:

1) staffing committee recommendation
2) determination of eligibility by district staff person designated program coordinator or designee
3) notice to parents of placement
4) notice to parents of due process procedures

III. Qualification of Instructional Personnel - there is evidence that exceptional students are assigned to classes or programs which fail to meet SBE criteria as stated in SBE 6A-6.503 - definition of qualified personnel and SBE 6A-6.311 - personnel employed in special programs for exceptional students. Students in a program taught by a teacher who does not meet these requirements are only eligible for the basic program cost factors.

A copy of correspondence to the Coordinator, Department of Education Internal Auditing identifying audit exceptions, if any, to be incorporated in the next financial audit of the district will be included in the report.

Following the receipt of the program audit report the school district should review the report. Should the district question the findings or have additional information which they wish to have considered, the school district should notify in writing within ten days, the Chief of the Bureau of Education for Exceptional Students.

PROCEDURAL STEPS FOR PROGRAM MONITORING BY ESDs:

1. Letter from OSPI to ESD and LEA superintendents informing them of general monitoring procedures.

2. Monitoring Manual from SPI to superintendents and directors of special education.

3. Letter from ESD superintendent to LEA superintendent.

4. Establish monitor(s).

5. Monitors review Rules and Regulations, monitoring procedures/make sure skills are current.

6. Establish date(s) for monitoring, provide adequate time for LEA to prepare materials and staff.

7. LEA director will notify his staff of the schedule for monitoring and the monitor(s).

8. Schedule entrance interview with LEA director and appropriate staff.

9. Director will notify monitor(s) where the records are located.

10. Monitor(s) will randomly select pupil records.

11. Monitor(s) will work through the records completing program review checklist on each folder.

12. Monitor(s) will follow up in classroom to complete program review checklist.

13. LEA director or district representative will escort monitor(s) to classroom.

14. Monitor(s) will present verbal report to director of program and appropriate staff.

15. Monitor(s) will complete written report which will be sent to LEA superintendent, director of special education, ESD superintendent and the Office of Superintendent of Public Instruction, Special Services Section.

16. ESD monitor develops summary of all ESD monitoring results which will be sent to all LEAs.

17. Letter to LEA superintendents and director of special education from ESD informing them of compliance results.

18. ESD sends summary to SPI.

RECOMMENDED PREPARATIONS BY LEAs FOR MONITORING

1. Have available all written policies and procedures that have been developed for WAC 392-171.

2. Arrange for space to accommodate three to five people, depending on size of monitoring teams. It should be located in an area where there is a minimum of disruption.

3. Have available class lists for the selection of students. If a student code is to be used in place of names, be prepared to translate code for LEA records.

4. Inform appropriate staff members that a monitoring team will be visiting your district.

5. Provide team members with a map of the district, where necessary, to ensure they are able to get to schools where objectives are located.

6. Provide monitoring teams with a list of all certified personnel.

7. Provide assistance only when requested. Avoid "looking" over the shoulders of the monitors.

EXCEPTIONAL STUDENT PROGRAM AUDIT

ENTRANCE INTERVIEW

The purposes of the entrance interview are to:

1) extend professional courtesy to the district administrators and staff

2) provide a general overview of the audit objectives, scope and procedures

Briefly (30 to 45 minutes) explain:

I. Audit Objectives:

A. Program improvement

B. Verify compliance with statutes, regulations and approved District Procedures for Providing Special Programs for Exceptional Students.

II. Audit Scope:

Components

1.0 Program Coordination
2.0 Personnel
3.0 Special Program Organizational Structure
4.0 Instructional Program
5.0 Facilities
6.0 Individual Student Profile

III. General Procedure:

A. Interviews

B. Examination of documents, records, etc.

Program Auditor:

(1) Indicate that FTE-1 Reports will be needed for each school scheduled to be audited in your program area, i.e. FTE-1 Report for all EMR's at school A, F, P and Z.

(2) Request information regarding records management procedures, i.e. Is there a school board policy?; Are exceptional student records in the cumulative record? If not, where?; etc., etc. Are there records in the district office which are not also present in the schools?

C. Observations

IV. Reporting:

A. Exit Interview

B. Written Report

C. Follow-Up Procedures

(1) Submit additional information in writing to ....

(2) Procedures as provided by SBE Rule 6A-1.453.

PREPARING FOR ON-SITE VISIT

TEAM RECRUITMENT, SELECTION, AND PREPARATION

Recruitment

Recruitment is both a regional and central office responsibility.

The central office will contact state-wide professional organizations to encourage their support and participation on the audit teams.

The Regional Special Education Directors will recruit as an on-going year-round effort. At every opportunity, such as area superintendent meetings and regional special education director's meetings, the need for team members should be mentioned. Particular emphasis should be put on the criteria for selection of team members to assure that the regional offices receive appropriate recommendations. Regional Directors should distribute to Special Education Administrators the sample memorandum to assure that appropriate information is given on the candidates. ( )

Selection

The following constituencies must always be represented on the team; Special Education Administrator, Regular Education Administrator, Special Education Teacher, Regular Education Teacher, Parent (elected by the Regional Advisory Council), Division of Special Education staff,one of whom serves as Chairperson.

Additional team members are added when size and type of district dictate, i.e. bi-lingual special educator, occupational educator, Department finance specialist, additional Division staff, etc.

The following criteria should be used when selecting the members of the team:

- Educators who have:

  at least three years of experience in teaching and/or administration

  demonstrated ability in working with children who have special needs

- Administrators with experience in a school system of comparable size and complexion

- Parents of children with special needs who have been elected by the Regional Advisory Council

- People who:

  have demonstrated qualities of sensitivity and discretion

  neither work, live, nor have children enrolled in the LEA being evaluated

  work beyond the adjacent community

If further screening of team members is desired, the chairperson may wish to ask potential team members to submit a letter requesting consideration giving background information on educational experience, expertise, and why they would like to serve.

Preparation

A formal letter should be sent to the team members confirming their participation, the date of the on-site visit, the date of the orientation meeting and requesting their preference for subcommittee assignments. The team member handbook should be enclosed with the letter. ( )

Back-up Team Member

Since a last minute loss of a team member will disrupt a carefully designed schedule, it is recommended that an alternate team member be selected and trained, who, if not used, will serve on the next audit.

ADMINISTRATION OF QUESTIONNAIRES

At the pre-audit meeting the Special Education Director is given sufficient questionnaires for staff members and school officials.

After explaining the audit process to his staff, questionnaires will be distributed by the Special Education Administrator to each staff person or school official designated on the cover sheet of the questionnaires except where the number of particular types of staff, such as regular class teachers exceeds fifty. In this case, a sampling should be taken by the Audit Chairperson from the staff list submitted by the Special Education Administrator. The sampling should attempt to select staff from each school at various grade levels but must assure that the number of teachers sampled at the elementary level be roughly equal to the number sampled at the secondary level.

For example, if you want to sample fifty regular class teachers from a total population of 400 it might breakout as follows:

	Elementary	Junior/Middle	High School	Total
Population	200	100	100	400
Sample	25	12	13	50

Within two weeks, the questionnaires should be completed and returned in a sealed envelope to the Director of Special Education who, in turn, will forward them to the Division of Special Education staff member who is chairperson of the audit team.

The chairperson will review, summarize, and analyze the questionnaires. They may be sent to the central office for computorized summary* or they may be summarized by hand which can be done by clerical staff. This summary should be completed and ready for distribution at the orientation meeting.

At the orientation meeting, team members will review the summary data and use it as a guide for additional questions for on-site interviews. The chairperson should be prepared to discuss those areas that he/she feels are of major import.

* To be operational in a few months

INDIVIDUAL CASE STUDY PROCEDURE

Purpose

The Individual Case Study is done to determine the extent to which required procedures are followed and services are being provided on an individual basis.

Sampling

Since, in most systems, the number of cases will be too large to look at each one, a systematic sampling must be done using the following guidelines:

- Determine total number you wish to do (In most cases, between 50 to 100)
- Select all appeals cases if number is low
- Select proportionate numbers of cases from all prototypes. For example, take every third or fifth or tenth, etc. as necessary from the list of students to complete your total. Be sure to include a balanced number from elementary, middle, and high school as well as some students in collaboratives. Advise Special Education Administrator at Pre-Audit meeting which cases you want to see and what you will be looking for in each folder. You will also need a place to examine them.

Completing the Checklist

If information required by checklist is not in folder, try to get it from Special Education Administrator.

In most cases, it will not be possible to complete Part II Program Delivery for each case study. Therefore, another sampling must be selected of your original sample from prototype 502.1 to 502.4 being sure to include elementary, middle, and high school as well as all appeals cases and some collaborative students. If collaborative students are being served in another community, it may be necessary to visit that program site (or sites) prior to the on-site visit.

Summarizing Results

When completed, all Part I and Part II sections should be summarized. This must be done by Division person because of confidentiality. Summaries can then be shared with team members at the orientation meeting.

SCHEDULING FOR ON-SITE VISIT

The schedule for the on-site visit is important because it is during this time that most of the data are collected and the preliminary report is produced. Because every system is different, there is no one schedule that applies to all program audits. However, while the specifics will change, there are some general practices and guidelines that can be applied that will make the schedule efficient.

This section is divided into two parts. The major part deals with creating the schedule of data collection and contains general guidelines which are followed by sample schedules. The second part deals with the schedule for developing the final report. These are general guidelines only and certain modifications or exceptions to these guidelines will be necessitated by, for example, the idiosyncrasies of the geography and school sizes.

Scheduling for Data Collection

There are several guidelines for scheduling. Some concern general operating procedures, and therefore are premises on which the schedule is based. Others pertain to the development of the schedule itself. The third group relates to the implementation of the schedule.

General Operating Procedures

- For the purpose of data collection, but not for preparation, team members should be treated as generalists. The interview protocols contain questions relating to several areas so that no person from LEA has to be interviewed more than once.

- It is not necessary to have every team member visit every school, but the schedules should be designed so two members visit each school in most cases.

- Team members should collect data individually. It is very inefficient for two team members to interview one person.

Developing the Schedule

- Keep the schedule as simple as possible. For example, in creating a schedule for a large system, rather than dealing with all of the schools in the system at once, subdivide it into smaller parts or modules which might contain, for example, four to six schools. Then after creating a schedule for one module, repeat it for the other modules in the system.

- Be jealous of school time. Use school time to interview teachers, principals, and other school staff, and make whatever observations are necessary. Remember also that lunch provides an opportunity to conduct interviews without disrupting a class. Use the time after school to interview central office personnel.

- Try to minimize traveling time. Consider the geography of the system so that the schools that a team member visits on any one day are close to each other.

- When two team members start out visiting the same school, try to keep them together in the afternoon as well. This will reduce both the number of cars needed and the number of stops to drop off and pick up partners.

- Be as realistic as possible in creating the schedule. While it is impossible to anticipate all contingencies, certain mistakes can be avoided. For example, be certain that you know the travel time between schools so as to avoid allowing five minutes to travel somewhere, when fifteen minutes are needed.

Implementating the Schedule

- By developing the schedule in advance, you can tell each school what day(s) and time(s) to expect team members. This will assure that the appropriate staff people are available when the team members arrive. Be sure not to schedule on staff release days.

- Be sure that team members know what they are expected to accomplish in each visit and approximately how much time each task should take. That is, if they know they are expected to complete five interviews, they are less likely to linger on other things.

- Encourage team members to arrive and leave their schools on time.

Sample Data Collection Schedule

In creating a schedule, it is first necessary to determine;

how many staff need to be interviewed
how many schools there are
how far apart the schools are

The first variable is related to school size which, for scheduling purposes,may be divided into small (most elementary) and large (most secondary).

You will need to allow roughly twice as many hours of interviews in a secondary school as you will need in an elementary school. Below are the estimates of time required for each.

Task	Time (in Mins.) at Larger Schools	Time (in Mins.) at Smaller Schools
Interview Principal	1 x 30 = 30	1 x 30 = 30
Interview Vice Principal	1 x 20 = 20	- -
Interview SPED Teachers	4 x 20 = 80	2 x 20 = 40
Interview Regular Teachers	6 x 15 = 90	2 x 15 = 30
Interview Specialists	6 x 20 =120	3 x 20 = 60
Follow-Up on Case Studies	4 x 15 = 60	2 x 15 = 30
Tour Building	20	15
	7 hours	3 hours 25 mins.

We have created two sample schedules which can be tailored to fit most LEAs with fewer than nine schools using a team of six members (excluding chairperson) where the schools are not extraordinarily large or far apart. It is illustrated and explained below.

SAMPLE DAILY SCHEDULE FOR DATA COLLECTION - TWO DAY SCHEDULE

DAY I Location	Total Interviewing Hours	9:00 11:15	11:15-12:15	12:15-2:15	2:15-3:15
"A" Ele. School (K-6) (600)	7	p**6	L	p5	Interviews with Central personnel
"B" Ele. School (K-6) (400)	4		U	p3,4	
"C" M.S. (7-8) (750)	7 3/4	p3	N		
"D" H.S (9-12) (1,500)	12 ¼	p1,2,4	C		
"E" Ele. School (K-6) (500)	4		H	p1,2	
"F" Ele. School (K-6) (600)	7	p5		p6	

DAY II Location	8:30-11:15	11:15-12:15	12:15-1:15	1:30-
A	p1	L	Interviews with Central personnel	Preparation of Report
B		U		
C	p5,2	N		
D	p6,3	C		
E		H		
F	p4			

* Approximate enrollment of school

** p represents the team members, i.e. p1 is one team member, p2 is another another team member and so forth.

- The schools are listed in approximate geographic order. That is, starting with "A" Elementary School, the closest school is "B" Elementary School, then "C" Middle School, and so forth. This kind of listing helps ensure that team members are not assigned to "distant" schools on the same day. Obviously with small school systems, where travel time is not a factor, this step is not so critical.

- The approximate enrollment is indicated to make it easier to determine how much time to spend in each school. When schedule is complete, add up total interviewing time allowed at each school to be sure it is proportionate to enrollment.

- The morning visit session is longer than the afternoon visit session. The uneven time slots give some flexibility in visiting schools of different sizes. Starting and closing times will have to be adjusted, to each LEA.

- The schedule does not include the chairperson, who would be available to fill in where needed.

- This schedule could easily be modified to audit seven or eight schools, by adding one or two team members.

- Notice that in the sample schedule, at least two members visit each school.

- By using the afternoon and evening of Day I and the afternoon of Day II to prepare the report, the team should have no difficulty in completing it during the second evening. Then, only the chairperson has to return the next day to review the preliminary findings with the SPED administrator.

- When a school system has nine schools or more, it may be advisable to have a three day audit -- two full days of visits and evenings of report preparation and the morning of the third day to follow-up on points or areas that need clarification. (Obviously, the size of the schools is a factor in deciding what schedule to use. Some systems have nine "small" schools and others may have nine "large" schools. In other words, total enrollment, including size of the 766 program, and not just numbers of schools should be considered in creating a schedule.)

  A sample schedule for audit of ten schools is illustrated and explained below.

SAMPLE DAILY SCHEDULE FOR DATA COLLECTION - THREE DAY SCHEDULE

DAY I Location	Total Inter. Hours	9:00 11:15	11:15 12:15	12:15 2:15	2:15 3:15	
"A" Ele. School (200)	2					
"B" Ele. School (600)	5½					
"C" J.H.S. (900)	7¼	p5,6				
"D" Ele. School (500)	4			p5,6		
"E" Ele. School (300)	4			p1,2		
"F" H.S. (2,000)	11¼	p1,2				
"G" J.H.S. (1,000)	6½	p3,4				
"H" Ele. School (400)	4			p3,4		
"I" Ele. School (700)	5½					
"J" Ele. School (500)	4					
DAY II		8:30 11:15				
A				p6		
B		p3,5				
C		p4				
D						
E						
F		p6		p3.4		
G				p5		
H						
I						
J		p1,2		p1,2		
DAY III	8:30 - 10:00		10:00 12:00	12:00 1:00	1:00 3:00	3:00 3:30
	Follow-up on points & areas that need clarification.		Complete Report	Feedback Session with SPED Adm.	Lunch	Oral Summary to LEA (Optional)

LUNCH

LUNCH

INTERVIEWS WITH CENTRAL "NON-SCHOOL" PERSONNEL

- This schedule has many of the same features, e.g. uneven time slots, omission of chairperson, listing of schools geographically, etc. and they will not be discussed again.

- Every school is visited by at least two team members, except for School A with 200 students. The larger ones are visited by three team members.

- A simple procedure for creating this schedule is to assign two team members to each of the three larger schools on the first morning. Then on the second morning, assign the three pairs to the next three largest schools. On the second afternoon, assign one pair to the remaining school, and the other team members as needed one to School A and others to the four largest schools or those with the largest 766 program.

- By adding additional people to the team, it is possible to cover additional schools according to the following schedule:

Number of Schools	Number of team members (excluding chairperson)
9 or 10 (illustrated)	6
11 or 12	7
13 or 14	8
15 or 16	9

Notice that this chart leads to a useful rule for estimating the number of team members that are needed. Simply stated the rule is that excluding the chairperson, the number of people needed for the program audit team is equal to one-half of the number of schools plus one. Thus a program audit for a system with twenty-two schools would need twelve team members in addition to the chairperson.

Additional considerations when using this rule are the size of the school, distance between schools and the number of days allocated for on-site visit. For example, an elementary school of less than 200 students and/or serving a limited grade span (k-3) may be visited only once by one team member.

Sample Schedules for Report Preparation

Sample A "completes" four reports on the first day and the remaining five reports on the second day. Sample B "waits" until the second day to formulate most of the preliminary reports and present them for team consensus. Both are written to accommodate a three-day schedule, but they could be adapted easily to a two-day schedule.

Sample A

DAY I

8:00 - 8:30 or 9:00	Coffee, introduction to Supt., Sped. Adm., et.al, last minute questions, instructions, brief meeting of sub-committees, etc.
9:00 - 3:30	School visitations and interviews with Central staff and parents
3:30 - 4:15	Sort data by area and give findings to Sub-committees
4:15 - 5:00	Sub-committees meet, review data, begin drafting preliminary report
5:00 - 5:45	Finance and Transportation Reports presented to Team for consensus
5:45 - 7:15	Dinner
7:15 - 8:00	Plan for Day II

DAY II

8:30 - 3:30	School visitations and interviews with Central staff and parents
3:30 - 4:15	Sort data by area and give findings to sub-committees
4:15 - 5:00	Sub-committees meet and draft preliminary reports
5:00 - 5:45	Public Communications and Staff Development reports presented to Team for consensus
5:45 - 7:15	Dinner
7:15 - 9:15	Physical Facilities, Core Evaluation, and Program Delivery reports presented to Team for consensus
9:15 - 9:30	Plan for Day III-additional data/verification needed

DAY III

8:30 - 10:30	Final data collection/verifications
10:30 - 12:00	Final revisions; Team approval of preliminary report; collect materials, vouchers, evaluations and dismiss Team
12:00 -	Feedback session with Sped. Administrator and Team leader
3:00 - 3:30	Oral summary for LEA staff (optional)

Sample B

DAY I

8:00 - 8:30 or 9:00	Coffee, introductions to Supt., Sped. Adm., et. al, last minute questions and instructions, brief meeting of sub-committees, etc.
9:00 - 3:30	School visitations and interviews with Central staff, parents
3:30 - 4:15	Sort data by area and give findings to sub-committees
4:15 - 5:45	Sub-committees meet, review data and begin drafting preliminary report
5:45 - 7:15	Dinner
7:15 - 8:00	Finance and Transportation reports presented to Team for consensus
8:00 - 8:30	Plan for Day II

DAY II

8:30 - 3:30	School visitations and interviews with Central staff and parents
3:30 - 4:15	Sort data by area and give findings to sub-committees
4:15 - 5:45	Sub-committees meet and draft preliminary report
5:45 - 7:15	Dinner
7:15 - 9:15	Remaining sub-committee reports presented for Team consensus
9:15 - 9:30	Plan for Day III - additional data or verifications needed

DAY III

8:30 - 10:30	Final data collection/verifications
10:30 - 12:00	Final revisions; Team approval of preliminary report. Collect materials, vouchers, evaluations and dismiss Team
12:00 -	Feedback session with Sped. Adm. and Team Leader
3:00 - 3:30	Oral summary for LEA staff (optional)

ORIENTATION MEETING FOR TEAM

A team orientation session should be held several days prior to the on-site visit. Its purpose is three-fold:

1. To provide a relatively calm situation for team members and the team leader to meet one another;

2. To provide an opportunity for the team members to receive all materials, information, and description of procedures well ahead of the on-site visit. The lag time allows the individual members to assimilate the information, clarify their roles, and frame any questions they may need answered prior to the on-site;

3. Finally, the session allows you to establish the Team Leader relationship with your team and to get a feeling for the individual team members' strengths and weaknesses.

The following sample agenda and materials checklist may be helpful in preparing for the orientation session.

SAMPLE AGENDA FOR ORIENTATION SESSION

A. Introductions and welcome by Project Director and Regional Coordinator.

B. Overview of audit: describe development, philosophy, instrument, process.

C. Historical discussion of particular LEA, if you wish, e.g.:

   1. School Committee support and/or control of 766

   2. Increases or decreases in Special Education programming

   3. Litigation underway, if any

   4. Summary of Appeals issues

   5. Description of exemplary programming

D. Explanation of pre-audit activities:

1. Questionnaire sampling process
2. Individual Case Study process
3. Parent contact process
4. Transportation and Finance reports, if done prior to on-site

E. On-Site visit:

1. Protocol during building visits
2. Review interviewing techniques, perhaps role playing an interview (See Section on Interviewing)
3. Discuss confidentiality issues; when report becomes public information
4. Stress importance of following schedule

BREAK

5. Distribute schedule and other materials. Check to see that packages are complete
6. Explain packages a piece at a time
7. Clearly define roles and responsibilities for each team member
8. Define report timelines and committee assignments (alter if necessary)
9. Discuss final report format and how it is is developed
10. Discuss summaries of questionnaires and case studies

F. Questions: Adjourn (on-time)

ORIENTATION MEETING

MATERIALS CHECKLIST

General Materials

- ☐ name tag
- ☐ pad of paper
- ☐ regulations
- ☐ physical facilities checklists
- ☐ Expense vouchers
- ☐ interview guides
- ☐ blank report forms
- ☐ criteria lists for assigned sub-committees

Team Information

- ☐ list of all team members
- ☐ committee assignments
- ☐ overall audit schedule including due dates of committee reports
- ☐ building visitation teams
- ☐ daily visitation schedule by team and building
- ☐ dining arrangements

LEA Information

- ☐ administrative structure chart with names of key people
- ☐ map of town with school locations
- ☐ directions to each school from headquarters with parking information
- ☐ school data information sheets
- ☐ list of any programs not located in regular school buildings

CHAIRPERSON'S CHECKLIST

☐ 1. Establish dates for on-site visit (be sure that regularly scheduled vacations and/or release times will not interfere with any phase of the audit).

☐ 2. Notify Central Office of planned audit and they will notify the LEA School Committee.

☐ 3. Select team members from candidates list in your region (be sure to provide any experts that may be needed, i.e. early childhood specialist, etc. See Section on Team Recruitment, Selection and Preparation).

☐ 4. Meet with Special Education Administrator to:

a. review list of team members
b. discuss his role in the audit (give him a copy of checklist for Special Education Administrator)
c. request that items a, b, c, and d from #2 be prepared as soon as possible, as you will need them to to prepare for the second meeting.

☐ 5. Notify team members and determine their areas of expertise and interests. ( )

☐ 6. Obtain appeals cases from Bureau of Special Education Appeals.

☐ 7. Complete Summary of LEA Education Plan (from LEA's current SPED form).

☐ 8. Discuss LEA End of Year Report (SPED form 5) with appropriate Regional staff person.

☐ 9. Select regular education teachers and specialists names from returned lists for questionnaire sample.

☐ 10. Select Individual Case Studies from returned list. (Use systematic sampling procedure to select a pre-determined proportionate number of students from each prototype. In the case of a small number, do all of them. See Section on Individual Case Study.)

☐ 11. Establish tentative schedule for on-site visit.

☐ 12. Meet with Special Education Administrator to cover the following:

☐ a. Review and update list of special education programs, resource rooms, substantially separate classes and others on the summary

☐ b. Give questionnaires to Special Education administrator with instructions on the distribution and specified names (completed questionnaires must be returned to you within two weeks).

- ☐ c. Get the names, location and times available of key people you are going to interview, e.g. school committee members, superintendent, director of pupil personnel services.
- ☐ d. Give Special Education Administrator the list of students selected for Individual Case Studies.
- ☐ e. Discuss tentative schedule for on-site visit.
- ☐ f. Discuss parking arrangements.
- ☐ g. Check space provided for Team Headquarters.
- ☐ h. Check on availability of typewriter, use of Xerox, etc.
- ☐ i. Collect any remaining information from list given to Special Education Administrator.

YOU WILL HAVE TWO WEEKS BETWEEN THIS MEETING AND THE TIME THAT THE QUESTIONNAIRES SHOULD BE RETURNED TO YOU. DURING THAT TIME YOU SHOULD:

☐ 12. Complete Individual Case Study checklist for each folder.

☐ 13. Summarize results of Individual Case Studies.

☐ 14. Send letters and questionnaires to parents ( ).

☐ 15. Summarize questionnaires (see Administration of Questionnaire).

☐ 16. Assign team members to sub-committees based on expressed interests and expertise, if possible

☐ 17. Schedule interviews with key LEA Administrators and staff (Assign team members by appropriate sub-committee, (see Scheduling for On-Site)

☐ 18. Finalize the visitation schedule (Be sure to include a preliminary meeting on the first day, 30 - 60 minutes for coffee, introductions of team to Superintendent and Special Education Administrator, review of the schedule and answering last minute questions.)

☐ 19. Review questionnaire summaries and individual cases to pick up any additional questions for sub-committees to ask during interviews.

☐ 20. Prepare draft reports for both Finance and Transportation if interviews were done prior to on-site.

☐ 21. Prepare all materials for the Orientation Session (see Section on Orientation meeting).

SPECIAL EDUCATION ADMINISTRATOR CHECKLIST

☐ 1. Inform administrative and teaching staff, both regular and special education, about the coming audit - dates, purpose, procedures, how staff will be expected to participate, etc. (if staff meeting is desired, Division Chairperson may assist in presentation.)

☐ 2. Prepare all necessary data and materials for audit Chairperson as follows:

- ☐ a. Complete list of students by grade and prototype.
- ☐ b. Complete list of regular education teachers by grade and subject.
- ☐ c. Complete list of all special education administration and teaching staff including: name, title, location and presently held State certification and Special Education approval(s).
- ☐ d. Data sheet on each school including: name, address, phone number, hours, name of principal and all Special Education staff in building (for itinerant staff include time when they are there), all Special Education programs housed there with prototype numbers, total enrollment and number of students.
- ☐ e. Organizational Chart of Administrative structure.
- ☐ f. Job descriptions for all Special Education personnel
- ☐ g. Any written administrative policy regarding on-going supervision of the staff.
- ☐ h. Copy of budget for present and previous year.
- ☐ i. All standard forms used for procedures in your system
- ☐ j. Notices sent to parents, media, community agencies etc., regarding screening and other services.
- ☐ k. Articles appearing in local newspapers regarding
- ☐ l. Map of community with school locations.
- ☐ m. Brief summary of each Special Education in-service training offered since September of last year including: target group, objective(s), total number of hours, whether voluntary or mandatory, any incentives offered and number attending.

☐ n. All completed Program Audit questionnaires distributed to your staff.

☐ 3. Coordinate dissemination and collection of questionnaires.

☐ 4. Organize folders for Case Study and provide place for Division personnel to examine them.

☐ 5. Provide comfortable, private meeting room to serve as Audit Team Headquarters.

☐ 6. Assist team members in scheduling interviews or arranging group meetings.

☐ 7. Be available throughout on-site visit to answer questions, clarify data and generally facilitate process.

☐ 8. Respond to factual accuracy of preliminary report.

☐ 9. Meet with staff to discuss Final Report and involve them in implementing its recommendations.

☐ 10. Draft written response to Final Report for School Committee within one month of receipt.

☐ 11. Work with own staff and Regional Education Center in implementing recommendations and correcting any non-compliance noted in Final Report.

☐ 12. Prepare new local education plan at appropriate time to reflect changes recommended in Final Report.

INTERVIEWING: MANAGEMENT AND TECHNIQUES

Management

During the on-site visit, it is important to ensure that:

- all key administrators are interviewed

  This is best accomplished by determining in advance which key administrators are to be interviewed and scheduling them for specific team members (The Superintendent and School Committee members should be interviewed by Audit Chairperson along with any other team member he/she may wish to include).

- interviews are not duplicated

- interviews of specialists and regular class teachers represent a balanced sample

  These may be accomplished in several ways: 1) assign team members to cover certain schools; 2) tack up on the wall a complete set of school data sheets and have team members mark off or write in the names and title of the staff they interviewed on the first day. When planning for second day's interviews, data sheets should be consulted; 3) group interviews for speech teachers, tutors or other intinerant teachers may be scheduled for a half hour right after school in the interests of time and convenience.

- interviews are not generally conducted by more than one team member

  Since the thoroughness and subsequent value of the final report depends on the accuracy and amount of data collected it is most important to maximize interviewing time. Good orientation and interview training is the key to team members feeling comfortable with this system.

Techniques

Since most of the data obtained in the program audit comes from interviews and since the method of interviewing can affect the responses that people give, it is very important that audit team members use proper interviewing techniques. The following suggestions are from the Team Member's Handbook.

SOME SPECIFIC TECHNIQUES OF INTERVIEWING

Proper Techniques ("Do's")	Improper Techniques ("Don'ts)

I. Before the Interview

1. Have the proper form ready.
2. Have more than one writing instrument ready.
3. Have your name tag visible.

II. Beginning the Interview

Proper Techniques ("Do's")	Improper Techniques ("Don'ts)
1. Introduce yourself, stating your name, position and the purpose and length of the interview.	1. Do not permit "outsiders" to be present during the interview.
2. Use rapport remarks or questions while getting settled for interview. (e.g. "This is a lovely new/old/big/small school." etc.)	
3. State the way in which the information respondent contributes is to to be used, assuring respondent that his/her replies will be kept confidential.	

III. Asking Questions

A. Phrasing Questions

Proper Techniques ("Do's")	Improper Techniques ("Don'ts)
1. Limit questions to a single idea.	1. Do not use leading questions, i.e. do not state respondent's conclusion for him, use emotionally loaded words, or associate one of the alternatives with an extremely desireable goal.
2. Keep questions brief.	2. Do not use words with double meanings (e.g. "fair" may mean "equitable" or "not very good")
3. Specify exactly the time, place, and context which you want respondent to assume. (e.g. "inservice programs offered by your system this year" or "last year" rather than "inservice programs.")	3. Do not make unrealistic assumptions about the experience of respondent or about the amount of information he posesses.
4. Specify either all the alternatives which respondent should have in mind when he answers or none of them.	

Proper Techniques ("Do's")	Improper Techniques ("Don'ts")
5. Use non-threatening phrases and words. (e.g. "Have you had a chance to...?" rather than "Have you...?")	4. Do not question validity of responses during interview.

B. Dealing with Sensitive Topics

1. Indicate that other people have conflicting opinions on that topic. (e.g. "Some people think core evaluations are too long. Others think they are too short to accomplish their purpose. What has been your experience?")

2. Use euphemisms (e.g. "methods of discipline" rather than "methods of punishment", "modify" rather than "revamp".)

3. Enable respondent to voice praise before criticism. (e.g. "What do you like best about...?" should precede "What do you like least about...?)

C. Probing for Additional Information

1. Briefly assert understandings and interest. (e.g. "I see", "um-hm," etc.)

2. Pause

3. Use neutral, open-ended questions. (e.g. "Could you tell me more about it?" "Why do you feel that way?", etc.)

D. Coping with Digression

Proper Techniques ("Do's")	Improper Techniques ("Don'ts")
1. Lead respondent back to relevant material with questions that relate what respondent said to the topic in which interviewer is interested.	1. Do not interrupt directly or abruptly.
2. Shorten long personal anecdotes by anticipating their ending.	

Proper Techniques ("Do's")	Improper Techniques ("Don'ts")

IV. Recording Interview Data

1. Be sure to record the basic identifying information. (e.g. name, position, school, etc.)	1. Do not move ahead to the next question without understanding and recording respondent's response.
2. If notetaking appears to make respondent uncomfortable say, e.g.: "I hope you won't mind my taking some notes. I talk to a good many people during the day, and I take notes so I can refresh my memory later."	
3. Know the purpose of each question to ensure you record the import of each response (separate the "wheat" from the "chaff").	

V. Interviewer's Demeanor

1. Make it clear you take the interview seriously.	1. Do not be wooden or artificially formal.
2. Show interest in what respondent is saying.	2. Do not reveal your own attitudes on the subject matter.
3. Maintain a manner of friendly acceptance.	3. Do not show direct approval or disapproval.
	4. Do not agree or say "I feel the same way myself".

VI. Ending the Interview

1. Thank the respondent for his/her time and contribution.
2. Explain that Final Report of the findings of the Team will be available in about a month from their Special Education Administrator or the Regional Education Center.
3. Check out at office with a thank you.

References

1. Kahn, Robert I. and Charles I. Cannell. The dynamics of interviewing. New York: Wiley, 1957.
2. Maccoby, E.E. and Nathan Maccoby. The interview: a tool of social science, Pp. 449-487 in Gardner Lindzey (ed.) Handbook of social psychology. Vol 1 Cambridge: Addison-Wesley, 1954.

DEVELOPING THE FINAL REPORT

Team members must understand that, in addition to their sub-committee assignment, they have a responsibility for collecting and sharing information on most subject areas (principally Staff Development, Core Evaluation, Program Delivery and Physical Facilities) with the appropriate sub-committees and with the Audit Team. Time must be set aside at the end of each day's visitations for individual members to write out reports for the appropriate sub-committees. The final report forms should be used and evidence should be clearly stated on the reverse side of the forms.

It is very important that evidence be specific, particularly on non-compliance issues.

When the sub-committees meet, the individual reports will be discussed and consolidated into a report to be submitted to the Audit Team. Sub-committees should have the list of criteria for their subject areas to be certain that they have addressed all of the appropriate issues.

The entire Audit Team meets to hear the reports of the sub-committees and to determine what should or should not go into the final report. The consensus of the whole team is important in this process, so the chairperson should encourage participation by all team members. At the same time he/she must keep the discussion focused on the issue at hand. When there is a question about the wording or syntax of a statement, don't try to settle it by committee. Assign one person to rewrite the statement.

The following guidelines should be used in writing the final report:

Commendations

should:	should not:
o cite accomplishments over and above the requirements of the regulations	• cite individuals by name; only by title
• cite significant improvements in certain areas	• name published materials
• cite specific exemplary programs or practices developed within the school system which might serve as a model for others	

Problem Areas

should:	should not:
• reflect real needs	• cite single incidents
• be well-documented	• mention sensitive negotiating issues
• be based on several observations or interviews	• reflect personal prejudices

- be assigned to the appropriate area
- be clearly stated
- be specific
- conflict with commendations
- repeat a non-compliance issue

Recommendations

should:

- be realistic
- allow LEA's flexibility in solving the problems or suggest a variety of options

should not:

- simply reword the problem area
- reflect personal prejudices
- give one specific resolution of a problem except as an example
- directly recommend hiring of additional staff unless there are no other options

Non-compliance Issues

should:

- be a direct violation of a regulation
- have well-documented evidence

should not:

- reflect unsubstantiated statements of single individuals
- include issues of suspected non-compliance in areas which are the responsibility of another Division of the Department of Education e.g. Bilingual, Occupational Education, etc.*

Recommendations on Non-compliance

should:

- set firm but realistic time lines
- place responsibility on appropriate staff or school committee i.e. procedural issues - special education director and/or superintendent; issues involving financial obligations - school committee

* Any such cases should be referred, in writing, to the appropriate Associate Commissioner or Bureau Director with a copy to the Superintendent of Schools and the Director of the Bureau of Program Audit and Assistance. To the extent that the problem interferes with the delivery of special services, it may be included in the Problem Areas of the appropriate section of the Final Report.

Closing Activities

When the Final Report is complete and accepted and before Team Members are dismissed, the following should be done:

- Collect all notes, binders, and name tag cases
- Complete and collect signed expense vouchers
- Complete (or have returned by mail) Team Member evaluation of Audit ( )
- Remove any charts tacked to the wall, coffee cups and other debris from tables, floor, etc. Room should be left as tidy as it was found
- Return typewriter and any other materials borrowed from LEA

Feedback Session with LEA

Prior to leaving the school system, the chairperson should meet with the special education administrator to review the major findings in the report that have not already been discussed during the course of the on-site visit. Other members of the team may attend this meeting but the chairperson speaks for the team.

A meeting with other members of the special education department prior to leaving the school system is optional. If the chairperson decides to hold such a meeting, the feedback session with the special education administrator must take place first. This is to avoid any public statements which may be inaccurate or inappropriate prior to the review and editing of the final report.

If the meeting with special education staff is held, it should last no longer than one half hour and should be used to thank the staff for their assistance and to summarize some general issues in the report. The chairperson should always note the commendations first.

QUESTIONNAIRE
Special Education Teacher

This questionnaire should be completed by all special education teachers (excluding speech therapists).

1.) Please designate the type of program below which best describes your assignment:

____ Special class
____ Part-time special class
____ Itinerant teacher
____ Resource room
____ Consultant
____ Work Study coordinator
____ Other (specify) _____
_____

2.) Please designate the most appropriate exceptionality area below which best describes your present assignment:

____ Multiply handicapped
____ Physically handicapped
____ Visually handicapped
____ Hearing impaired
____ Emotionally disturbed
____ Learning disabled
____ Communication handicapped
____ Educable mentally retarded
____ Trainable mentally retarded
____ Severe/Profound mentally retarded
____ Other _____
_____

3.) Please designate the level of program below which best describes your present assignment:

____ Preprimary (age 0-5)
____ Primary (age 6-9)
____ Intermediate (age 10-12)
____ Junior High (age 13-14)
____ Senior High (age 15-21)

4.) Do you consider your class size adequate to meet the individual needs of your students? ____ yes ____ no

If no, why? _____

5.) If your class is self-contained, does the age range of the assigned students exceed five years? ____ yes ____ no

6.) Are written referral procedures available for regular class teachers and parents to refer children with suspected learning difficulties?
____ yes ____ no ____ not certain

7.) Do you use the same student referral system if you need additional child study information for students in your special education program?
____ yes ____ no

8.) Have all of your assigned students been placed through case conference committee procedures?
____ yes ____ no

9.) To what extent have you participated in case conference for students assigned to your special ed. program?
___ all students ___ most ___ a few ___ none

10.) Is physical and/or occupational therapy provided to every student whose case conference or annual case review report identifies such therapy as necessary to maintain the student in an appropriate educational program?
____ yes ____ no

11.) Is the length of the instructional day for all of your students the same as for all other students in your building?
____ yes ____ no

12.) Are all relevant special education student information files and records readily available to you?
____ yes ____ no

13.) Do you administer any prescribed medicines to any of your students?
____ yes ____ no

14.) Are annual case reviews conducted on all students assigned to your special education program?
____ yes ____ no

(a.) Do you participate in each annual review conference for all of your students? ____ yes ____ no

15.) Do you have an aide available for anytime during the day?
____ yes ____ no

(a.) If yes, for how long? _____

(b.) If you have an aide, has she been provided with preservice and in-service through a training curriculum relevant to: (1) the special needs and characteristics of the students, (2) enhancement of her communicative and social interacting skills, (3) creating an awareness of the ethical responsibility involved in working in schools?

____ yes ____ no ____ uncertain

(c.) If you have an aide, has she been provided with an orientation period that brings together the supervising teacher, the special ed. aide, and the supervisor to clarify their respective roles and functions?

____ yes ___ no

16.) Is adequate and appropriate equipment provided for your special education program?

____ yes ___ no

17.) Are adequate and appropriate materials provided for your special education program?

____ yes ___ no

18.) Does your present classroom facility and space seem adequate?

____ yes ___ no

19.) Are all of the students in your program who need transportation provided this service?

____ yes ___ no

20.) Does the transportation schedule permit all handicapped students to receive a full instructional day?

____ yes ___ no

GDC/cm

SPEECH, LANGUAGE AND HEARING CLINICIANS - QUESTIONNAIRE

This questionnaire should be completed by all speech clinicians.

	yes	no
1. Are you aware of students who are between the ages of 6-18 years who have non-maturational communication handicaps and are not enrolled in therapy?		
2. Has each enrolled student received a diagnostic evaluation (prior to enrollment in therapy) administered by a certificated speech, language and hearing clinician?		
3. Has your caseload exceeded 100 students at any given time?		
4. If you schedule on a block system, is your caseload for each block reduced from the 100 maximum to allow for the intensive nature of the program?		
5. Are medical evaluation forms on file for each student with an acoustic, voice, neurological and/or physiological condition which may be related to the communication disorder?		
6. Is hearing screening conducted for all students in grades 1-4-7-10, all children transferred from other school districts and all children suspected of having hearing defects?		
7. Are personal parent interviews attempted prior to obtaining consent to evaluate?		
8. Is written parent permission obtained prior to evaluating each student?		
9. Is written parent permission obtained prior to enrolling each student in therapy?		
10. Are your facilities (physical environment, equipment and furniture) where therapy is conducted adequate for the number of students, their ages and their disorders?		
11. Do local policies exist for referring a student for an individual case study?		
12. Do you participate as a member of the case conference team for students referred for suspected learning difficulty, who in addition, have speech, language and/or hearing handicaps?		

GDC/cm

QUESTIONNAIRE

Principals

The State Division of Special Education has the responsibility to approve local special education programs and services. As part of the program review process we would like to have input from school administrators. Please respond to the applicable questions below to the best of your knowledge.

Please return the questionnaire to the local director of special education along with any teacher questionnaires which you may have been asked to distribute. Thank you for your time and assistance.

1. How many special education teachers (excluding speech clinicians) are on staff in your school? _____

2. Are standard student referral forms available in your building for students with suspected learning difficulties?
   _____ YES _____ NO

3. When a pupil is referred, do you fully inform the child's parent of the referral and the reasons for it?
   _____ YES _____ NO

   (a.) If no, who informs the parents? _____

   _____

4. How are parents initially informed of their child's referral and the reasons for it?

   ____ a. personal interview (conference)

   ____ b. telephone

   ____ c. home visit

   ____ d. mail

   ____ e. other _____

5. If a personal interview about the referral is refused by the parents for any reason, is the referral information mailed to them?
   _____ YES _____ NO

6. Is the parents' written permission obtained before any individual tests are administered to a pupil who has been referred for suspected learning difficulties?
   _____ YES _____ NO

7. Who typically attends case conference meetings for students from your building? _____

_____

8. If you have special education programs in your school, are special education students integrated into regular classes when appropriate for the student?

_____ YES _____ NO _____ NA*

9. Do special education students participate in school activities with the general student body?

_____ YES _____ NO _____ NA

10. If special education students are being integrated into regular classes, are the regular class teachers being provided the necessary supportive and consultative services?

_____ YES _____ NO _____ NA

11. Have any students enrolled in special education programs in your school been expelled any time during this school year?

_____ YES _____ NO

a.) If yes, how many have been expelled? _____

12. If it is necessary for medicine to be given to a special education student during the school day, is parent consent obtained and on file?

_____ YES _____ NO

13. Is the administration of medicine to students in special education programs solely your responsibility?

_____ YES _____ NO

a.) If no, who else is responsible? _____

14. Is the length of the instructional day for students in special education programs in your building equivalent to that for regular class students of the same age level?

_____ YES _____ NO _____ NA

15. Are class sizes and age ranges for special education programs in your school within the recommendations as stated in the regulatory Rule S-1 provisions?

_____ YES _____ NO _____ NA

16. Are all students in special education programs in your school who need transportation provided this service?

_____ YES _____ NO _____ NA

17. Does classroom space for all special education programs including speech therapy meet standards as approved by the Commission on General Education?

_____ YES _____ NO _____ NA

*NA (not applicable) - use this when special education programs do not exist in your building and the question does not apply.

18. Does the location of programs for students in special education facilitate their integration into the school environment?

_____ YES _____ NO

19. In regard to special education programs, does your school center's budget include funds to:

a.) purchase new materials and supplies? _____ YES _____ NO

b.) replace materials and equipment? _____ YES _____ NO

c.) repair existing equipment? _____ YES _____ NO

20. Do secondary level students enrolled in special education programs receive credits toward graduation as other students in general and vocational education programs?

_____ YES _____ NO _____ NA

21. How many students in your school attendance area are transferred to special education programs housed in other schools or facilities?

_____

22. If you do <u>not</u> have special education programs (excluding speech therapy) in your school, do you feel students in your building are given less consideration for special education programs and services?

_____ YES _____ NO _____ NA

23. Do you feel there is a need for special education programs (or additional services) in your school center?

_____ YES _____ NO

If yes, what type of program and/or services? _____

_____

_____

24. Please make any comments or recommendations about the special education programs or services in your district? _____

_____

_____

_____

25. About how often do you perform each of the following Rule S-1 related activities?

	ALWAYS	OFTEN	SOME-TIMES	SELDOM	NEVER
a. Screen referrals					
b. Assist teachers in modifying regular class program prior to referral					
c. Process referrals					
d. Inform parents in a personal interview of a referral					
e. Obtain parental permission for individual testing					
f. Inform parents of case conference committee meeting					
g. Attend case conference committee meeting					
h. Chair case conference committee meetings					
i. Obtain parents permission for special education placement					
j. Provide parents written notice of the proposed placement and reasons therefore					
k. Provide parents with written notice of the right to a hearing					
l. Schedule annual case review sessions with parents of students in special education programs					
m. Attend annual case review sessions					
n. Chair annual case review sessions					
o. Monitor medical, psychological and other relevant special education pupil reports for required three year re-evaluations					
p. Hire special education personnel in your building					
q. Supervise special education personnel in your building					

GDC/cm
1/18/77

PROGRAM AUDIT System: _____

QUESTIONNAIRE: PARENT Name: _____

Public Communication

1. Have you learned about Chapter in any of these ways?

		Yes	No
a.	school system	___	___
b.	school newsletter	___	___
c.	newspaper	___	___
d.	radio	___	___
e.	television	___	___
f.	State Dept. of Education	___	___
g.	parent group	___	___
h.	advocacy group (Office for Children, Assoc. for Retarded Citizens, etc.)	___	___
i.	friend	___	___
j.	doctor	___	___
k.	some other way (please name it)		

_____

_____

Kindergarten Screening

2. When your child entered kindergarten, did the school test him (her) for:

	Yes	No
a. hearing	___	___
b. eyesight	___	___
c. speaking	___	___
d. getting along with others	___	___
e. movement skills (walking, running, coordination, etc.)	___	___
f. general health	___	___
g. background of growing up (age of walking, talking, etc.)	___	___

3. Were you told about the results of these tests?

___Yes ___No ___Not Sure

Core Evaluation

4. During the Core Evaluation process of your child, did you:

	Yes	No
a. participate in a pre-evaluation meeting with a member of the evaluation team?	___	___
b. participate in a meeting with either the school nurse, social worker, or guidance counselor to discuss your family history?	___	___
c. attend and participate in the Core Evaluation Team meeting where the educational plan for your child was developed?	___	___
d. know that you could bring a friend, advocate, or specialist to the educational plan meeting?	___	___
e. understand the educational goals that were set for your child?	___	___
f. have an opportunity to meet the Director of Special Education or a member of the Core Evaluation Team to discuss any problems you had about the educational plan?	___	___
g. know of your rights if you chose not to accept the educational plan?	___	___

5. Did your child's education plan include transportation?

___Yes ___No ___Not Sure ___child did not need special transportation

Program Delivery

6. If your child requires special transportation, does the school make arrangements so your child can go to:

	Yes	No	Don't Know
a. after school programs?	___	___	___
b. special school trips?	___	___	___

7. About how often have you been told about your child's progress in school in the following ways?

	Once a Month	Once Every 2-3 Months	Once Every 4-6 Months	Once Every Year	Never
a. letter	_____	_____	_____	_____	_____
b. report card	_____	_____	_____	_____	_____
c. telephone	_____	_____	_____	_____	_____
d. individual meeting	_____	_____	_____	_____	_____
e. group meeting	_____	_____	_____	_____	_____
f. other way (how?) _____	_____	_____	_____	_____	_____

8. In general, how helpful is this information about your child's progress?

___very helpful ___somewhat helpful ___not very helpful ___not sure

9. About how often have you met with the specialists working with your child?

___once a month

___once every 2-3 months

___once every 4-6 months

___once every year

___never

10. How satisfied are you with the program your child is receiving?

___very satisfied ___satisfied ___dissatisfied ___very dissatisfied

If dissatisfied, why?

Have you discussed this with school people?

What was the result?

PROGRAM AUDIT

QUESTIONNAIRE: RESOURCE ROOM TEACHER

System: _____

School: _____

Level: EL MID HS

Instructions:

As you may know, the Department of Education is required by law to monitor the implementation of Chapter . One phase of the monitoring process is the Chapter Program Audit. Part of the audit consists of a self-evaluation questionnaire, which we would like you to complete at your earliest convenience. Please be frank.

In a few weeks, an audit team will be visiting your school system to speak with staff members and parents about special education programs. Because they will not have time to interview everyone, you may not be contacted. However, if there is something you would like to discuss with them, please tell the Chairperson of the Audit Team at your Regional Education Center that you would like to speak with one of them.

Thank you for your cooperation. When you have completed the questionnaire, please return it to your special education administrator in a sealed envelope with your name on the outside.

Staff Development

1. To whom are you directly responsible? (Check all that apply.)

___Director of Pupil Personnel Services
___Special Education Administrator
___Principal
___Assistant Principal
___Department Chairperson
___Other (title) _____
___Not sure

2. Who is responsible for evaluating your performance? (Check all that apply.)

___Director of Pupil Personnel Services
___Special Education Administrator
___Principal
___Assistant Principal
___Department Chairperson
___Other (title) _____
___Not sure

3. How many times each year is your performance formally evaluated; that is, you receive a written and/or oral report?

___1 ___2 ___3 ___4 or more ___never

4. Since September, 1974, what in-service training program(s) relevant to Chapter has your school system offered? For each topic that has been offered, please give the following information: (1) the approximate duration of the training, (2) whether personnel from your system or from an outside agency provided the training, (3) whether you volunteered or were required to attend, and (4) the kinds of incentive(s), if any, offered to encourage attendance.

Topic	Duration			Provider				Incentive				
	Less than 5 hours	5-15 hours	More than 15 hours	Your school system	Outside agency or Consultant	Voluntary	Mandatory	Credit	Stipend	Salary Increment	Released time	None
a. philosophy and process	—	—	—	—	—	—	—	—	—	—	—	—
b. Chairperson's role in the Core Evaluation	—	—	—	—	—	—	—	—	—	—	—	—
c. Teacher's role in the Core Evaluation	—	—	—	—	—	—	—	—	—	—	—	—
d. Identifying students who may need special services	—	—	—	—	—	—	—	—	—	—	—	—
e. Formal & informal assessments	—	—	—	—	—	—	—	—	—	—	—	—
f. Writing educational objectives and plans	—	—	—	—	—	—	—	—	—	—	—	—
g. Translating assessment results into educational programs	—	—	—	—	—	—	—	—	—	—	—	—
h. Methods for integrating students in need of special services in regular programs	—	—	—	—	—	—	—	—	—	—	—	—
i. Coordination of special ed. and regular ed. programs and personnel	—	—	—	—	—	—	—	—	—	—	—	—
j. Classroom management	—	—	—	—	—	—	—	—	—	—	—	—
k. Individualizing instruction	—	—	—	—	—	—	—	—	—	—	—	—
l. Support services available	—	—	—	—	—	—	—	—	—	—	—	—
m. Material resources available	—	—	—	—	—	—	—	—	—	—	—	—
n. Adapting materials for students in need of special services	—	—	—	—	—	—	—	—	—	—	—	—
o. Resource rooms	—	—	—	—	—	—	—	—	—	—	—	—
p. Behavior management techniques	—	—	—	—	—	—	—	—	—	—	—	—
q. Working with parents	—	—	—	—	—	—	—	—	—	—	—	—
r. Record keeping	—	—	—	—	—	—	—	—	—	—	—	—
s. Other (specify)_____	—	—	—	—	—	—	—	—	—	—	—	—

5. Check below:

A. How helpful was the training that your school offered?

B. In what area(s) do you think you could benefit from training, even if it has been offered previously?

Area	Helpfulness of Training				Need for Training			
	Very helpful	Somewhat helpful	Not very helpful	Did not attend	Great need	Some need	Little or no need	Do not know
a. philosophy and process	—	—	—	—	—	—	—	—
b. Chairperson's role in the Core Evaluation	—	—	—	—	—	—	—	—
c. Teacher's role in the Core Evaluation	—	—	—	—	—	—	—	—
d. Identifying students who may need special services	—	—	—	—	—	—	—	—
e. Formal and informal assessments	—	—	—	—	—	—	—	—
f. Writing educational objectives and plans	—	—	—	—	—	—	—	—
g. Translating assessment results into educational programs	—	—	—	—	—	—	—	—
h. Methods for integrating students in need of special services in regular programs	—	—	—	—	—	—	—	—
i. Coordination of special ed. and regular ed. programs and personnel	—	—	—	—	—	—	—	—
j. Classroom management	—	—	—	—	—	—	—	—
k. Individualizing instruction	—	—	—	—	—	—	—	—
l. Support services available	—	—	—	—	—	—	—	—
m. Material resources available	—	—	—	—	—	—	—	—
n. Adapting materials for students in need of special services	—	—	—	—	—	—	—	—
o. Resource rooms	—	—	—	—	—	—	—	—
p. Behavior management techniques	—	—	—	—	—	—	—	—
q. Working with parents	—	—	—	—	—	—	—	—
r. Record keeping	—	—	—	—	—	—	—	—
s. Other (specify)_____	—	—	—	—	—	—	—	—

6. If you are new to the school system, did you receive any orientation to process? ___Yes ___No

If yes, was it thorough enough? ___Yes ___No

Core Evaluation

7. a. Approximately how many students have you referred for a core evaluation or re-evaluation within the past 12 months?

___none ___1-2 ___3-5 ___6-10 ___more than 10

b. For how many of these students was the time span between your referral and the completion of the educational plan:

	all	most	some	few	none
(1) 30 school working days or less	___	___	___	___	___
(2) between 31-60 school working days	___	___	___	___	___
(3) more than 60 school working days	___	___	___	___	___

8. For how many of your students:

	all	most	some	few	none
a. did you contribute to the writing of the educational plan?	___	___	___	___	___
b. do you have a copy of or access to the educational plan?	___	___	___	___	___

Program Delivery

9. Which of the following issues, if any, do you discuss with other staff members who work with your students and about how often do you discuss them?

	Frequency				
Issues Discussed	Daily	Weekly	Monthly	Quarterly	Little or No Contact
Student Progress or Problems	___	___	___	___	___
Methods of Instruction	___	___	___	___	___
Materials	___	___	___	___	___
Other (specify):	___	___	___	___	___

10. In what way(s) are programs coordinated for individual students as they move from one level (e.g., elementary, middle, secondary) to the next? (Check all that apply.)

___Meetings between sending and receiving teachers

___Meetings between sending and receiving administrators

___Forwarding Reports

___Other (specify) _____

___Don't Know

11. In general, do you feel that you have appropriate materials for your students?

___Yes ___No

12. Are there any kinds of materials that you would like to have? Please indicate your need for each of the following kinds of materials?

Material	Great need	Some need	Little need	No need
a. Films, tapes, slides	___	___	___	___
b. Games, simulations	___	___	___	___
c. Manipulative material	___	___	___	___
d. Audio visual equipment	___	___	___	___
e. Printed material (texts, books, workbooks, etc.)	___	___	___	___
f. High interest, low vocabulary reading materials	___	___	___	___
g. Reading development materials	___	___	___	___
h. Individualized kits and materials	___	___	___	___
i. Informational resources	___	___	___	___
j. Commercial catalogs	___	___	___	___
k. Catalog of materials and equipment available within system	___	___	___	___
l. Supplies (pencils, paper, etc.)	___	___	___	___
m. Other (specify)_____ _____	___	___	___	___

13. About how often do you have the following kinds of communications with parents about your students?

Communication	Frequency: Weekly	Monthly	Quarterly	Semi-Annually	Annually	No Contact
a. Written report/letter	___	___	___	___	___	___
b. Telephone	___	___	___	___	___	___
c. Individual meeting	___	___	___	___	___	___
d. Group meeting	___	___	___	___	___	___
e. Other (specify)_____						
_____	___	___	___	___	___	___

14. Do you have an aide?

___Yes, full-time ___Yes, part-time ___No

15. How many students do you serve in total?

___less than 10 ___10-19 ___20-29 ___30-39 ___40 or more

16. What is the greatest number of students in your class at any one time?

___4 or less ___5-8 ___9-12 ___13 or more

17. Is the age range between youngest and oldest students in your class at any one time greater than 3 years?

___Yes ___No

18. How many of your students remain in your class:

	All	Most	Some	Few	None
a. no more than 25% of the day?	___	___	___	___	___
b. 26% - 60% of the day?	___	___	___	___	___
c. more than 60% of the day?	___	___	___	___	___

STRUCTURED INTERVIEW RECORDING FORM

A E A P E R S O N N E L

Interviewer's Name_____ Date_____

Position of Respondent (Supervisor, etc.)_____

Mark X if the question is not asked

Mark DNK if interviewee does not know

1A. Have there been any changes in special education since the Area Education Agencies came into existence?

1B. Does your support service area provide more or less service? (Circle one and continue response below.)

1C. Is the quality of service better or worse? (Circle one and continue response below.)

2A. How do you feel about the procedures used by your AEA to evaluate students in special education?

2B. How do you feel about the procedures used by your AEA to identify students?

2C. . . . to place students?

2D. Is the paper work involved in this procedure (identification, evaluation, placement) worth the investment?

2E. Is the time invested in this process worth it?

2F. Are the appropriate people involved in staffings? YES_____, NO_____.
(With negative response ask for elaboration.)

Who is usually involved?

2G. Has a staffing been held on every child who is currently in a special education program? (With negative response ask for elaboration.)

2H. What help does the AEA provide after child is placed in special education?

3A. Are handicapped students weighted (1.8, 2.2, 4.4) and placed properly in your AEA? (With negative response ask for elaboration.)

3B. Are they placed on what they need, or what's available now:

3C. Is all the money generated for handicapped children really spent for them?

4A. How do you feel the director of special education is functioning in the role?

4B. How do you think the support personnel, such as consultants, speech clinicians, school psychologists, etc., are functioning?

5. Even though your case load may be appropriate now, if it was drastically reduced, in what specific ways would your services change?

6. If you have a good idea to improve services in your area, would there be barriers? YES_____, NO_____.

If yes, what would they be?

7A. How are administrative decisions made in the AEA?

7B. If you have a question about special education, to whom do you go?

7C. If you have gone to this person recently, was the response adequate?

8. How do you acquire or update your professional skills?

9. Would you recommend to a professional colleague that he/she come to work in this AEA? YES_____, NO_____.

   If so, why?

   If not, why?

10. What are the major strengths and weaknesses of the AEA special education operation.

STRENGTHS	WEAKNESSES

11. If you could change something about the AEA in special education, what would it be?

12. Is there anything else about the special education program and the AEA that you want to say?

PARENT INTERVIEW

District:_____ AEA:_____ Staff Member:_____

Age of Child:_____ Date:_____

Class Model: (circle) RIP, SCSC, SCI

Disability: (circle) LD, ED, MD, HI, VI, PD, CD, CM, SP, Multidisabilities

Level: (circle) P, E, S

COMPONENT	WHAT AND HOW	FINDINGS
1) Placement 12.18(2) 12.11(1) 12.20(2)	1a) Was your son or daughter receiving special education services prior to July 1, 1975?	1a) Yes_____ No_____ Comment:
	1b) Who, in the school system, first discussed with you the special needs of your son or daughter?	1b) Parent Comment:
Due Process State Plan	1c) Did you sign forms giving written permission for evaluation of your child before he/she was formally evaluated?	1c) Yes_____ No_____ When:_____ Comment:

District:_____ AEA:_____ PARENT INTERVIEW Staff Member: _____

COMPONENT	WHAT AND HOW	FINDINGS
12.19(1c)	1d) Were you notified of the staffing during which it was determined if your child was to be served in special education?	1d) Yes_____ No_____ Comments:
	1e) Were you invited to attend?	1e) Yes_____ No_____ If no, would you have liked to attend? YES_____ NO_____
	1f) Did you attend the staffing? What do you think about the procedure?	1f) Yes_____ No_____ Comments:
	1g) Was your son or daughter ever placed on a waiting list for special education services?	1g) Yes_____ No_____ About how long?_____
	1h) How do you feel about the program that is being provided to your child?	1h) Comments:
	1i) Is your son or daughter integrated into activities with nonhandicapped students such as art, music, P.E. or any academics?	1i) Yes_____ No_____ Comments:

169

District:_____ AEA:_____ PARENT INTERVIEW Staff Member:_____

COMPONENT	WHAT AND HOW	FINDINGS
2) Individual Educational Plan 12.21(1) (2)	2a) Have you ever seen individualized goals and objectives specifically for your son or daughter?	2a) Yes____ No____ Comments:
	2b) Do you receive regular written or verbal reports from the teacher/ school about your child's program?	2b) Regular? Yes____ No____ How often?_____ Are the reports clear? Yes____ No____
	NOTE: Be sure parent knows you are referring to the child's special education program in items above.	
	2c) Does the school re-evaluate your son or daughter each year to determine if his/her program needs are changing?	2c) Yes____ No____ NA____
3) Due Process 12.24(1)	3a) Can you look at your child's records if you ask to?	3a) Yes____ No____
	3b) Have you done this?	3b) Yes____ No____ Comments:
State Plan	3c) Do you know if you can get an independent evaluation of your child outside the school system?	3c) Yes____ No____ Where would you go?_____ Comments:

District:_____ AEA:__ __ PARENT INTERVIEW Staff Member:_____

COMPONENTS	WHAT AND HOW	FINDINGS
	3c) Can the school place your child in a special program if you're opposed to it?	3c) Yes____ No____ Comment:
	3d) If you have a question on special education or about your child, who would you ask?	3d) _____
	3e) If they couldn't help you, who could?	3e) _____
4) Transportation 12.9	4a) Are you satisfied with the transportation arrangements made by the school for your child?	4a) Yes____ No____ Comment:
	4b) How much time is your child on the bus/car one way?	4b) Time:_____
5) Rule exceptions	5a) List all rule exceptions which are required.	

Record here any general observations you have about the parent interview.

1) Both parents present?

2) Involvement in parent group

3) Knowledge of rights and legislation

4) Information on the AEA

5) Suggestions for improvement of services

ADMINISTRATOR INTERVIEW FORM

Name _____ Date _____

District _____

School _____ Monitor _____

PUBLIC AWARENESS

I-5 1. What special education opportunities are available in your district?

IDENTIFICATION

I-6 2. Did you receive a written copy of the district identification process?

_____ Yes _____ No

I-15 3. What procedures are used in your district to identify exceptional children?

I-11 4. After identification can you refer a child for services other than special education evaluation? _____ Yes _____ No If yes, what are these services?

REFERRAL

I-17 5. What referral system is used in your district?

I-16 6. How can parents and students request a referral for evaluation?

I-18 7. Is the district referral system useful:

_____ Yes _____ No

If not, what changes would you recommend?

EVALUATION

I-29 8. How are you informed of the results of special education evaluations?

I-30 9. How are the evaluation results used in developing the child's education program?

PLACEMENT

PP-1 10. Are you included in multidisciplinary placement conferences? ____ Yes ____ No

PP-13 11. What is your role in the placement conference?

PP-14 12. Did you have a chance to express your opinion about the proposed placement?

____ Yes ____ No

PP-18 13. What procedures are used in your district for developing IEP's?

PP-19 14. Is your district IEP procedure useful? ____ Yes ____ No

If not, what changes would you recommend?

REVIEW OF PLACEMENT

PP-27 15. What procedures are used in your district for review of placement?

PP-28 16. Are you consulted in the review of placement process? ____ Yes ____ No

ALTERNATIVE PROGRAMS

AP-6 17. Do regular programs seem to be effective for all special education students participating in them? ____ Yes ____ No

If not, what would you recommend?

AP-7 18. Are adequate support services available for special education students participating in the regular program? ____ Yes ____ No

If not, what would you recommend?

AP-8 19. Is there coordination among all staff providing services to the special education student? ____ Yes ____ No.

AP-9 20. What is the district procedure for determining the academic and behavioral progress of special education students?

AP-13 21. What procedures are used to assure that students in work experience programs are provided with full-time instruction if employment is not available or is terminated?

FACILITIES

F-1 22. Are special education students housed separate from regular school facilities?

____ Yes ____ No

If yes, are the special education facilities equal to the regular education classes in the district? ____ Yes ____ No

F-2 23. Are the special education facilities adequate with regard to:

space _____
ventilation _____
lighting _____
acoustics _____
appearance _____
maintenance _____
accessibility _____
lack of distractions _____
individual/group instructional space _____
electrical outlets _____
desks/chairs _____

If no, give recommendations for changes.

PARENT INVOLVEMENT

PI-1 24. Is there a special education parent advisory committee operating in your district? ____ Yes ____ No

PI-2 25. How does your district encourage parent involvement in the special education program?

CLASSROOM TEACHER INTERVIEW FORM

Name _____ Date _____

District _____ Monitor _____

Number of Handicapped Students _____ Types of Handicapping Conditions _____

IDENTIFICATION

I-5 1. Describe the special education opportunities in your district.

2. Do you feel that the community in general is aware of the special education program in the district? ____ Yes ____ No

If not, what would you recommend?

I-6 3. Did you receive a copy of the district identification process? ____ Yes ____ No

I-15 4. Describe the identification procedures established by the district.

REFERRAL

I-11 5. After identification can you refer a child for services other than special education evaluation? ____ Yes ____ No

What are those services?

I-17 6. Describe the district system of referral for evaluation for possible placement in special education.

I-18 7. Is the district referral system useful? ____ Yes ____ No

If not, what changes would you recommend?

I-29 8. How are you informed of the results of the special education evaluation?

I-30 9. How are the evaluation results used in developing the child's educational program?

PLACEMENT

PP-1 10. Are you included in multidisciplinary placement conferences for children considered for special education placement? ____ Yes ____ No

PP-13 11. Describe your role in the multidisciplinary placement conference.

PP-14 12. Did you have a chance to express your opinion about the proposed placement

____ Yes ____ No

PP-12 13. How soon after parents give approval are children enrolled in special education programs?

PP-18 14. What procedures are used in the district for developing individualized education programs?

PP-19 15. Is the procedure the district uses to develop IEP's useful? ____ Yes ____ No

If not, what changes would you recommend?

REVIEW OF PLACEMENT

PP-27 16. What procedures are used in your district for review of placement?

PP-28 17. Are you consulted in the semester review of placement process for special education students participating in your classroom? ____ Yes ____ No

PP-26 18. Are you involved in review of placements before termination of special education programs and services? ____ Yes ____ No

ALTERNATIVE PROGRAMS

AP-6 19. Do regular programs seem to be appropriate for all special education students participating in them? ____ Yes ____ No

If not, what would you recommend?

AP-7 20. Are adequate support services (such as counseling, occupational therapy, medical, audiological services, etc.) available for special education students participating in the regular program? ____ Yes ____ No

If not, what would you recommend?

AP-8 21. Is there coordination among all staff providing services to the special education student? ____ Yes ____ No

How could this coordination be improved?

AP-9 22. What is the district procedure for determining the academic and behavioral progress of special education students?

FACILITIES

F-1 23. Are special education facilities equivalent to the regular education classes in the district? ____ Yes ____ No

If not, what changes would you recommend?

DIAGNOSTIC PERSONNEL INTERVIEW FORM

Name _____ DATE _____

District _____ Schools _____

Monitor _____

PUBLIC AWARENESS

I-5 1. Describe the special education opportunities in your district.

IDENTIFICATION

I-6 2. Did you receive a written copy of the district identification process?

____ Yes ____ No

I-15 3. Describe the identification procedures established by the district.

REFERRAL

I-17 4. Describe the district referral system.

I-18 5. Is the district referral system useful? ____ Yes ____ No

If not, what changes would you recommend?

EVALUATION

I-21 6. Who writes the evaluation reports for:

a. medical findings _____
b. educational history _____
c. developmental history _____
d. adaptive behavior (if primary language is other than English _____
_____

I-27	7. Describe the district review and approval process for evaluations conducted by professionals outside the educational system.
I-29	8. How are you informed of the results of special education evaluations?
I-30	9. How are the evaluation results used in developing the child's educational program?
94-9	10. What procedures are used to assure that tests and other evaluative materials are validated and recommended by the producer for the specific purpose for which they are used:
94-10	11. What procedures are used to assure that test results accurately reflect the aptitude and achievement level of children with impaired sensory, manual or speaking skills?
PP-1	12. Are you included in multidisciplinary placement conferences for children considered for special education placement?
PP-7	13. How is eligibility for special education placement determined?
PP-13	14. Describe your role in the multidisciplinary placement conference.

PP-14 15. Did you have an opportunity to express your opinion about the proposed placement? ____ Yes ____ No

PP-18 16. What procedures are used in your district for developing IEP's?

PP-19 17. Is the procedure your district uses to develop IEP's useful? ____ Yes ____ No

If not, what changes would you recommend?

PP-22 18. How often does reevaluation occur?

REVIEW OF PLACEMENT

PP-26 19. Are you involved in review of placements before termination of special education programs and services? ____ Yes ____ No

PP-27 20. What procedures are used in your district for review of placement?

ALTERNATIVE PROGRAMS

AP-6 21. Do regular programs seem to be appropriate for all special education students participating in them? ____ Yes ____ No

If not, what would you recommend?

AP-7 22. Are adequate support services available for special education students participating in the regular program? ____ Yes ____ No

If not, what would you recommend?

AP-8 23. Is there coordination among all staff providing services to the special education student? ____ Yes ____ No

FACILITIES

F-2 24. Are the facilities for diagnostic personnel adequate? ____ Yes ____ No

If no give recommendations for changes.

PARENT INTERVIEW FORM

Parent's Name _____ Date _____

District _____ Monitor _____

IDENTIFICATION

I-5 1. What are the special education opportunities in your district?

I-5 2. Do you feel that the community in general is aware of the special education programs in the district? ____ Yes ____ No

REFERRAL

I-16 3. How can parents request a referral for evaluation of their child?

EVALUATION

I-19 4. Did you give written permission for your child to be tested? ____ Yes ____ No

I-29 5. How were you informed of the results of the special education evaluation?

Phone ____ School personnel visiting home ____
Meeting at school ____ Multidisciplinary conference ____
Letter ____ Other:

I-30 6. How were the evaluation results used in developing your child's educational program?

PLACEMENT

PP-1 7. Were you asked to attend the placement conference held at the school when they were considering special education for your child? ____ Yes ____ No

PP-2 8. Did you receive a written notice before your child's placement conference?

____ Yes ____ No

PP-6 9. Were you informed of your rights as a parent at the placement conference?

____ Yes ____ No

PP-13 10. What was your role in the placement conference?

PP-14 11. Did you have a chance to express your opinion about the placement?

____ Yes ____ No

PP-21 12. Did you receive a copy of your child's review of placement? ____ Yes ____ No

PP-28 13. Were you consulted concerning the review of placement of your child?

____ Yes ____ No

ALTERNATIVE PROGRAMS

AP-6 14. Do the regular school programs seem to you to be appropriate for your child at the times when he/she is attending them? ____ Yes ____ No

AP-9 15. What is your district's procedure for determining the academic and behavioral progress of your child who is receiving special education services?

PARENT INVOLVEMENT

PI-1 16. Is there a parent advisory committee for special education operating within your district? ____ Yes ____ No

PI-2 17. How does your district encourage parent involvement in the special education program?

SPECIAL EDUCATION ADMINISTRATOR INTERVIEW FORM

Name _____ Date _____

District _____ Monitor _____

IDENTIFICATION

I-9 1. Does your district perform vision and hearing screening in accordance with the Department of Health Services Hearing and Vision Screening Program?

____ Yes ____ No

REFERRAL

I-11 2. After identification, can a child be referred for services other than a special education evaluation? ____ Yes ____ No

If yes, what are those services?

I-16 3. How can parents and students request a referral for evaluation?

EVALUATION

I-27 4. What process is used in your district for review and approval of evaluations conducted by professionals outside the educational system?

I-30 5. How are evaluation results used in developing the child's educational program?

PLACEMENT

PP-7 6. Who is responsible for determining eligibility for special education placement?

PP-8 7. How do you assure that children are educated in the regular classroom unless the severity of the handicap would make it unsatisfactory?

PP-22 8. How often does reevaluation occur?

PP-24 9. What procedures are used to communicate the results of the review of placement to parents?

PP-29 10. What pupil-staff and pupil-teacher ratios were established by your district?

AP-1 11. Does your district have a process for review of progress and integration of voucher-placed children? ____ Yes ____ No

AP-2 12. Do you notify the Division of Special Education if students are added to the approved private school contract? ____ Yes ____ No

AP-3 13. Are private school personnel included in placement and review of placement?

____ Yes ____ No

AP-4 14. Do you have procedures for evaluating private school programs in which your district's students are placed? ____ Yes ____ No

AP-5 15. Do you have procedures for returning private school placed children to the regular program? ____ Yes ____ No

FACILITIES

F-1 16. Are special education students housed separate from regular school facilities?

____ Yes ____ No

If yes, are the special education facilities equal to or better than the regular education classes in the district? ____ Yes ____ No

PARENT INVOLVEMENT

PI-1 17. Is there a parent advisory committee for special education operating in your district? ____ Yes ____ No

PI-2 18. How does your district encourage parent involvement in the special education program?

P.L. 94-142 REQUIREMENTS

94-8 19. Are evaluations conducted before transfer of a child from a special education program to full-time regular class placement? ____ Yes ____ No.

If yes, what types of evaluations?

94-11 20. What placement options are available for:

a. regular classes _____
b. supplementary services _____
c. special class _____
d. special schools _____
e. home instruction _____
f. hospitals and institutions _____

94-12 21. Are provisions made for all of the alternative placements identified in the IEP's? ____ Yes ____ No

94-13 22. Are children educated in the school which they would attend if not handicapped unless otherwise stated in the IEP? ____ Yes ____ No

94-14 23. At the multidisciplinary conference, what consideration is given to any potentially harmful effects on the child or on the quality of service which he or she needs?

94-23 24. What steps are taken to assure that handicapped children have available to them the variety of programs and services available to non-handicapped children including art, music, industrial arts, home economics, vocational education, etc?

94-24 25. What steps are taken to provide the opportunity for handicapped children to participate in non-academic and extra-curricular services and activities?

94-25 26. Is physical education made available to every handicapped child in your district? ____ Yes ____ No

94-26 a. If children are unable to participate in the regular program are steps taken to insure that physical education provided to the child is comparable to services provided to non-handicapped children?

____ Yes ____ No

94-27 27. What has the district developed to assure that the scheduling of the IEP meeting is at a mutually agreed upon time and place for parents and school personnel?

94-28 28. What provisions are made to insure parent participation if they cannot attend the IEP meeting?

94-29 29. What documentation is maintained of the attempts to arrange a mutually agreed upon time and place for the IEP meeting?

94-30 30. What action is taken to insure that the parent understand the proceedings of the meeting including arranging for an interpreter for parents who are deaf or whose native language is other than English?

SPECIAL EDUCATION TEACHER INTERVIEW FORM

Name _____ Date _____

District _____ Schools _____

Categories _____ Monitor _____

IDENTIFICATION

I-5 1. What special education opportunities are available in your district?

Do you feel that the community in general is aware of the special education programs in the district? ____ Yes ____ No

I-6 2. Did you receive a written copy of the district identification process?

____ Yes ____ No

I-15 3. What are the identification procedures established by the district?

REFERRAL

I-18 4. Is the district referral system useful? ____ Yes ____ No

If not, what changes would you recommend?

EVALUATION

I-29 5. How are you informed of the results of the special education evaluations?

I-30 6. How are the evaluation results used in developing the child's educational program?

PLACEMENT

PP-1 7. How are you included in multidisciplinary placement conferences for children considered for special education placement?

PP-13 8. Describe your role in the multidisciplinary placement conference.

PP-14 9. Did you have an opportunity to express your opinion about the placement?

____ Yes ____ No

PP-12 10. How soon after parents give approval for placement are children enrolled in special education programs?

PP-18 11. What procedures are used in your district for developing individualized education programs?

PP-19 12. Is the procedure your district uses to develop IEP's useful? ____ Yes ____ No

If not, what changes would you recommend?

REVIEW OF PLACEMENT

PP-26 13. Are you involved in review of placement before termination of special education programs and services? ____ Yes ____ No

PP-27 14. What procedures are used in your district for review of placement?

PP-28 15. Are you consulted in the review of placement process for your students?

____ Yes ____ No

PP-30 16. What is the pupil-teacher ratio in your class?

AP-6 17. Do regular programs seem to be appropriate for all special education students participating in them? ____ Yes ____ No

If not, what would you recommend?

AP-7 18. Are adequate support services available for special education students participating in the regular programs? ____ Yes ____ No

If not, what would you recommend?

AP-8 19. Is there coordination among all staff providing services to the special education student? ____ Yes ____ No

AP-9 20. What is the district procedure for determining the academic and behavioral progress of special education students?

AP-13 21. What procedures are used to assure that students in work experience programs are provided with full-time instruction if employment is not available or is terminated?

FACILITIES

F-1 22. Are special education students housed separate from regular school facilities?

____ Yes ____ No

If yes, are the special education facilities equal to the regular education classrooms in the district? ____ Yes ____ No

F-2 23. Are the special education facilities adequate with regard to:

a. space ____
b. ventilation ____
c. lighting ____
d. acoustics ____
e. appearance ____
f. maintenance ____
g. accessibility ____
h. lack of distractions ____
i. individual/group instruction space ____
j. electrical outlets ____
k. desks/chairs ____

If no, what changes would you recommend?

PARENT INVOLVEMENT

PI-1 24. Is there a parent advisory committee for special education operating in your district? ____ Yes ____ No

PI-2 25. How does your district encourage parent involvement?

P.L. 94-142 REQUIREMENTS

94-23 26. Are handicapped children able to participate in programs and services available to non-handicapped children including art, music, industrial arts, home economics and vocational education? ____ Yes ____ No

If no, what would you recommend?

94-24 27. Are handicapped children able to participate in non-academic and extra-curricular services and activities? ____ Yes ____ No

If no, what would you recommend?

94-25 28. Is physical education made available to every handicapped child in your district? ____ Yes ____ No

2.0

Personnel

Intent: The purpose of these audit items is to: (1) verify that instructional personnel assigned to exceptional student programs are "qualified" according to SBE Rules, thus qualify the program for weighted FTE funding. (6A-1.503; 9/8/76 6A-6.321); (2) verify that evaluation specialists are licensed or appropriately certified as required by SBE Rule. (6A-6.331)

Method: The program auditor must utilize documentary evidence in verifying that personnel hold appropriate certificates for the area to which they are assigned or are approved Out of Field. Documentary evidence is also to be utilized to verify licensure and/or certification of evaluation specialists. (This is to be accomplished through: (1) examination of personnel records or reports at the district level; (2) comparison of records with Florida Course Codes.)

Program Auditor: Utilizing the official district personnel records:

(1) Request the records of the district director, supervisory staff, all instructional personnel, and evaluation specialists assigned to the program in the schools being audited.

(2) For the district and for each school, record the names of all instructional personnel and evaluations specialists utilizing the appropriate worksheet.

(3) Record current assignment--part-time; full-time; itinerant school psychologist; audiologist; etc.

(4) Record the certificate or license number.

(5) Record rank and area(s) of certificate or other license information.

(6) Indicate with an "X" all appropriate status statements:

_____Appropriately certified/licensed
_____1st year, no prior out of field assignment
_____2nd year or more, 6 hours toward certification prior to 9/1/76

_____Medical exemption in lieu of 6 hours
_____School board approval
_____Approved out of field

(7) Record additional comments as needed.

2.0

Evaluation Specialists

AUDIT WORKSHEET

School _____

Name	Current Assignment	License/ Certificate No.	Other License Inf.		Appropriately Certified/ Licensed	1st yr., no prior out of field assignment	6 hrs. prior to 9/1/76	Medical Certificate	School Board Approval	Approved out of Field	Comments
			Rank	Area(s)							

2.0

PERSONNEL
AUDIT WORKSHEET

School	Name	Current Assignment	Certificate Number	Rank	Area(s)	Appropriately Certified	lst yr., no prior out of field assignment	2nd yr. or more-6 hrs. prior to 9/1/76	Medical Certificate	School Board Approval	Approved out of Field	Comments

PLACEMENT DOCUMENTATION CHECKLIST

District_____ Date_____

Monitor _____

N/A = Not applicable

		YES	N/A	YES	N/A	YES	N/A	YES	N/A	TOTAL
I-10	1. Were district identification procedures completed within 45 calendar days after enrollment for kindergarten and new students enrolled without records?									
I-12	2. Were the identification procedures utilized, the dates and the results documented in the child's placement folder?									
I-13	3. Was the primary language of the home and child noted on the pupil record?									
I-14	4. Was all communication in the primary language of the home?									
I-19	5. Was written consent of the parent or guardian obtained prior to the evaluation?									
I-20	6. Were all required evaluation components conducted during the evaluation process? (SEE BACK OF FORM)									
I-21	7. Were all required sections included in the evaluation report? (SEE BACK OF FORM)									
I-22	8. Was there evidence that gifted children demonstrated achievement or potential ability in one or more of the following areas: a. creative or productive performance b. specific academic aptitude-95th percentile or above c. general intellectual ability-I.Q. 130 or above									
I-23	9. Were all evaluations conducted by appropriately certified or licensed personnel?									
I-24	10. Was one of the following procedures used for children whose primary language is other than English? a. an evaluator fluent in child's primary language & Eng. b. an interpreter c. test instruments which do not stress spoken language and are valid and reliable performance measures									

Question 6 (1-20)

SPH- 1. Current audiometric screening
2. Review of academic history and classroom functioning
3. Assessment of functional communication skills
4. Assessment of speech problem by certified speech/language therapist

HBD- 1. Certification by competent medical doctor that the child will be unable to attend regular classes for not less than 3 months.
2. Assessment of current educational level
3. Specialized evaluations as required to understand the child's problem.

ALL OTHER 1. Educationally relevant medical findings
2. Educational history including efforts to educate the child in the regular classroom
3. Developmental History
4. Educational evaluation

EMH, TMH, LD 1-4. Above
5. Complete psychological evaluation including a comprehensive intellectual assessment test by a school psychologist, assistant school psychologist or psychometrist under the direction of a school psychologist

EH 1-4. Above
5. Comprehensive psychological or psychiatric evaluation by a school psychologist, psychiatrist or psychologist certified by the State Board of Psychologist Examiners.

HH 1-4. Above
5. Complete audiological evaluation

VH, PH, MH 1-4. Above
5. Medical certification to establish severity and implications of the impairment

Question 7
(Conditions and Standards, p.3, i-ix)

c. For all other handicapped children, an evaluation shall contain in writing but is not limited to:
i) Reason for referral
ii) Educationally relevant medical findings
iii) Educational history of the child including complete documentation of efforts to educate the child in the regular classroom
iv) Determination whether the child's educational problems are related to or resulting from reasons of educational disadvantage
v) Developmental history of the child
vi) Types of tests administered to the child and results of such tests
vii) Recommendations of specific goals and instructional objectives based upon current levels of performance needs.
viii) A current vision and hearing screening
ix) An educational evaluation

		YES	NA	YES	NA	YES	NA	YES	NA	TOTAL
I-26	11. If the child's primary language is other than English, was an adaptive behavior assessment conducted and documented?									
I-25	a. Was a home visit conducted with parent consent?									
I-28	12. Was the evaluation completed within 60 school days of the referral?									
	a. If not, were the parents notified and given an expected date when the evaluation would be completed?									
	b. Was the Department of Education notified of evaluations delayed more than 90 school days?									
PP-1	13. Were all of the following persons included in the multidisciplinary pl[illegible] conference? a. school principal b. person responsible for conducting special education courses c. child's teacher d. evaluation personnel e. parent or guardian unless there is written indication they do not wish to attend									
PP-1a	14. If mini-conferences were held, were the following persons included? a. all listed in #13 contacted b. evaluation personnel present c. an appropriate teacher present d. parent or guardian unless there is written indication they do not wish to attend e. one other person listed above if parent does not attend									
PP-2	15. Was written notice sent to the home prior to any conference?									
PP-3	16. Was written indication obtained from parents when they did not wish to participate in the conference?									
PP-4	17. Were the results of the multidisciplinary conference included as part of the student's records?									
PP-5	18. Did the conference report include eligibility for special education placement, proposed alternative programs and the results of the evaluation?									
PP-10	19. Did the parents indicate by signature on a form which is in English and the primary language of the home understanding of the placement, parental rights and their agreement or disagreement concerning the proposed placement?									
PP-11	20. Was there parental approval for children placed or retained in a special education program?									

200

201

		YES	NA	YES	NA	YES	NA	YES	NA	TOTAL
PP-12	21. Were the recommended programs and services provided no later than 90 school days following authorization? a. Were the parents or guardians and the Department of Education notified of placements delayed for more than 90 school days?									
PP-15	22. Was an IEP developed or revised at the beginning of the school year?									
PP-16	23. Did the individualized planning conference include a representative of the school district, the child's teacher, one or both parents and where appropriate, the child?									
PP-17	24. Were the following components included in the IEP? a. Present level of educational performance b. annual goals c. short term instructional objectives d. educational services to be provided e. extent of participation in the regular program f. projected date for initiation and duration of services g. evaluation procedures									
PP-20	25. Was there a review of placement once each semester?									
PP-21	26. Was a copy of the semester placement review submitted to the parents?									
PP-22	27. Was there evidence that re-evaluation occurred every three years or as necessary to determine continued placement or termination?									
PP-23	28. Was there a formal review prior to continuation or change in special education placement?									
PP-25	29. Did the parents give their consent for continuation or change of placement?									
PP-26	30. Was there a complete review of the child's educational status prior to termination of special education program									
AP-10	31. Is each student enrolled in a special education work experience program at least 16 years of age?									
AP-11	32. Has each student in a special education work experience program been given a vocational evaluation which assesses aptitudes, interests, and special needs in relation to job placement?									
AP-12	33. Was a vocational plan developed for each student including goals, provision of an adjusted curriculum and supervised job placement in relation to the abilities and needs of the individual student?									

AEA: _____ AEA PLANS, POLICIES AND PROCEDURES REVIEW Evaluator: _____

Date: _____

1) Does the AEA have on file procedures for identification of handicapped students?		YES	NO	Consistent with AEA Plan? YES	NO	Consistent with Rules of Special Education? YES	NO	Are they complete and accurate? YES	NO
a) Screening	12.18(1)	a) ____	____	a) ____	____	a) ____	____	a) ____	____
b) Referral	12.18(2)	b) ____	____	b) ____	____	b) ____	____	b) ____	____
c) Staffing	12.19(1a)	c) ____	____	c) ____	____	c) ____	____	c) ____	____

COMMENTS:

2) Does the AEA have on file procedures to protect child/parent rights?	YES	NO	Consistent with Rules or State Plan? YES	NO	Are they complete and accurate? YES	NO	How are these made available to others? And, to whom are they available? HOW	TO WHOM
a) Inform parents of screening results. 12.19(1c)	a) ___	___	a) ___	___	a) ___	___	a)	
b) Parent permission for evaluation. State Plan	b) ___	___	b) ___	___	b) ___	___	b)	
c) Parent notification for placement with opportunity to appeal. State Plan	c) ___	___	c) ___	___	c) ___	___	c)	
d) Parent participation in staffing. 12.19(1c)	d) ___	___	d) ___	___	d) ___	___	d)	
e) Release of confidential information. 12.24(1)	e) ___	___	e) ___	___	e) ___	___	e)	

Comments:

AEA:_____ PLANS, POLICIES AND PROCEDURES REVIEW Evaluator:_____

Date:_____

		Has the format been recommended to LEA's?	Does it meet the intent of the Rules?	
	YES NO	YES NO	YES NO	
3) Is there a description of a process for developing individual educational plans for each child? 12.21(1) & (2)	3) ___ ___	3) ___ ___	3) ___ ___	Comments:
4) Is there a written procedure to insure at least annual re-evaluation?	4) ___ ___	4) ___ ___	4) ___ ___	Comments:
		Is it used in developing the AEA Plan and reflected in the chart? YES NO		
5) Is there a plan for helping to achieve complete continuum of program and service options? I2.3(6)	5) ___ ___	5) ___ ___	5) ___ ___	Comments:

206

29A

AEA:_____ PLANS, POLICIES AND PROCEDURES REVIEW Evaluator:_____

Date:_____

COMPONENT	WHAT AND HOW	FINDINGS
6) Rule Exceptions 12.32	Collect Rule Exceptions that have been filed and cross check with those needed by other staff members on site.	List rule exceptions which need to be requested from the sample districts evaluated: District_____ Nature of exception: District_____ Nature of exception: District_____ Nature of exception: District_____ Nature of exception:

AEA:_____ PLANS, POLICIES AND PROCEDURES REVIEW Evaluator:_____

Date:_____

COMPONENT	WHAT AND HOW	FINDINGS
7) Contracts 12.11(4) 12.12(2) 12.37	7a) Collect contracts that are on file at DPI and compare with contracts in effect at the AEA.	7a) List any not filed for DPI approval. _____ _____ _____ _____ _____
	7b) Review language of the contact to see that: 1) payments can be conditioned upon appropriate delivery of service, and 2) expenditures are planned only for educational purposes.	7b) Comments:

209

209A

AEA:_____ PLANS, POLICIES AND PROCEDURES REVIEW Evaluator:_____

Date:_____

COMPONENT	WHAT AND HOW	FINDINGS
7) Contracts	7c) Interview two AEA administrative personnel to validate 7b.	7c) Comments:
	7d) Validate two contracts by on site observation.	7d) Are the actual activities consistent with contract? YES NO 1) Contractor observed_____ ___ ___ Comments: 2) Contractor observed_____ ___ ___ Comments:

210

210 A

AEA:_____ LEA PLANS, POLICIES AND PROCEDURES REVIEW Evaluator:_____

Date:_____

COMPONENT	WHAT AND HOW	District A _____ (A Large District)	District B _____ (Another District)	District C _____ (A Small District)
8) LEA Policies	8) Has the LEA adopted board policies in the following areas:			
	8a) Commitment to provide appropriate programs/ services for handicapped students.	8a) yes____ no____ Comment:	8a) yes____ no____ Comment:	8a) yes____ no____ Comment:
	8b) Provision for maximum integration with non-handicapped students, as possible.	8b) yes____ no____ Comment:	8b) yes____ no____ Comment:	8b) yes____ no____ Comment:
	8c) Provision for parent involvement in educational planning for their child			
	1) staffing	8c)(1) yes____ no____ Comment:	8c)(1) yes____ no____ Comment:	8c)(1) yes____ no____ Comment:

AEA:_____ LEA PLANS, POLICIES AND PROCEDURES REVIEW Evaluator:_____

Date:_____

COMPONENT	WHAT AND HOW	District A	District B	District C
		_____ (A Large District)	_____ (Another District)	_____ (A Small District)
8) LEA Policies	8c)			
	2) consent for evaluation	8c)(2) yes____ no____ Comment:	8c)(2) yes____ no____ Comment:	8c)(2) yes____ no____ Comment:
	3) notification for placement with appeal, if needed.	8c)(3) yes____ no____ Comment:	8c)(3) yes____ no____ Comment:	8c)(3) yes____ no____ Comment:
	8d) Are AEA policies on file at the LEA?	8d) yes____ no____ List them:	8d) yes____ no____ List them:	8d) yes____ no____ List them:

5100-C47511-2/77 INDIVIDUAL CASE RECORD REVIEW

Evaluator: _____

Student: _____ Date: _____

School and LEA where program provided: _____

District of residence: _____

Age: _____ Disability: _____ Class Model: _____

Weighting from P.U.P. _____

		YES	NO	N.A.
1) Screening 12.18	1a) Record of screening results?	___	___	___
	Date of Screening: _____			
	1b) Parents notified in writing of these results?	___	___	___
	1c) Evidence of follow-up?	___	___	___
	Comments:			
2) Referral 12.18(2)	2a) Record of written referral?	___	___	___
	Date? _____			
	2b) Date of first special education service? _____			
	2c) Date of first special education program? _____			
	2d) How many days from initial referral to first placement? _____			
	2e) Evidence of feedback to original referral source?	___	___	___
	Comments:			

3) Evaluation 12.19(1b)	3a) Is there a written record of assessment in each of the following areas:	Yes	No	Date of Assessment
	1) Vision	___	___	_____
	2) Hearing	___	___	_____
	3) Speech & Language	___	___	_____
	4) Intellect	___	___	_____
	5) Social Functioning	___	___	_____
	6) Academic Status	___	___	_____
	7) Health History	___	___	_____
	8) Other elements deemed appropriate (formal or informal) LIST: _____			

215

INDIVIDUAL CASE RECORD REVIEW

Student:_____ Evaluator:_____

			YES	NO	
3) *Pass unless review is in your specialty area.	3b)	Do the instruments and procedures used seem appropriate for this youngster? Comments:	___	___	*Pass_____
12.3(4) (5)	3c)	Is the diagnosis supportable from the written record?	___	___	*Pass_____
	3d)	Was the evaluation conducted prior to placement?	___	___	
	3e)	Signed parent consent form for evaluation?	___	___	
	3f)	If the records have been released, is there evidence of a release form?	___	___	
4) Staffing 12.19(1a)	4a)	Is there written evidence that a staffing team has been used? Comments:	___	___	
	4b)	Who attended this staffing? List by positions:	_____		
		_____	_____		
		_____	_____		
		_____	_____		
	4c)	Is there written evidence that the parent was invited to attend the staffing?	___	___	

INDIVIDUAL CASE RECORD REVIEW

Student:_____ Evaluator: _____

			YES	NO	
4)	4d)	Is there a written record of staffing results?	___	___	
	4e)	Do the recommendations of the staffing team seem to be supportable based on child specific data that is maintained in this record? Comments:	___	___	*Pass_____
	4f)	Have these recommendations been implemented?	___	___	
	4g)	Does the weighting seem appropriate based on information maintained in the record? Comments:	___	___	
5) Placement 12.21(1) (2)	5a)	Is the student served in the least restrictive model that seems appropriate based on written evidence? Comments:	___	___	
	5b)	Is there written evidence of notification for placement to parents with opportuntiy to appeal?	___	___	
	5c)	Is the individual educational plan in writing?	___	___	

INDIVIDUAL CASE RECORD REVIEW

Student:_____ Evaluator:_____

			YES	NO
5)	5d)	Does the Individual Education Plan contain the following components?		
		1) Goals/objectives behaviorally stated, time referenced and measureable.	___	___
		2) Methods and materials specified.	___	___
		3) Schedule of activities stated.	___	___
		4) Evidence of periodic progress reports to parent, regular teachers and student.	___	___
		Comments:		

			YES	NO	N.A.
6) Reevaluation 12.19(4)	6a)	Is there written evidence of the annual reevaluation?	___	___	___
		Comments:			
	6b)	How long ago was the last re-evaluation, in months?	_____		
	6c)	List persons involved by position:	_____		
		_____	_____		
		_____	_____		
	6d)	Is there written evidence that the parents have been notified of reevaluation results?	___	___	___

GENERAL COMMENTS:

PROGRAM AUDIT School: _____

INDIVIDUAL CASE STUDY CHECKLIST Prototype: _____

Student's Name _____ Teacher's Name: _____

CORE Evaluation	Yes	No	Not Indicated	Comments
1. Was there an attempt to modify the regular program before referral?				
2. Was a pre-evaluation conference held?				
3. a. Was a full CORE evaluation recommended?	___	___	___	
b. Was an intermediate CORE evaluation recommended?	___	___	___	
4. Was a translator provided (if necessary)?				
5. Did the parents consent to:				
a. give the family history (home visit)?	___	___	___	
b. a medical examination	___	___	___	
c. examination by other specialists?	___	___	___	
6. Were these assessments completed:				
a. family history	___	___	___	
b. medical examination	___	___	___	
c. examination by other specialists	___	___	___	
7. Was the evaluation completed within 30 school working days of referral?				
8. Were any of the following present when the educational plan was developed?				
a. CET chairperson.	___	___	___	
b. Parent(s).	___	___	___	
c. Current teacher.	___	___	___	
d. Receiving teacher.	___	___	___	
e. Counselor.	___	___	___	
f. Registered Nurse	___	___	___	
g. Social Worker.	___	___	___	
h. Psychologist	___	___	___	
i. Physician (or designee).	___	___	___	
j. Appropriate Specialist(s).	___	___	___	
k. Other (who?)_____	___	___	___	

ICSC	Yes	No	Not Indicated	Comments
9. Does the educational plan include:				
a. list of participants.	___	___	___	
b. prioritized objectives.	___	___	___	
c. learning style/physical constraints	___	___	___	
d. specific objectives	___	___	___	
e. time frame for meeting objectives .	___	___	___	
f. instructional setting (class, small group, individualized).	___	___	___	
g. complete service delivery plan stating where, with whom, starting date, and frequency and duration. .	___	___	___	
h. participant signature	___	___	___	
i. materials (equipment or other information).	___	___	___	
j. program prototype	___	___	___	
k. criteria for movement to less restrictive setting	___	___	___	
l. transportation plan	___	___	___	
m. liaison person.	___	___	___	
10. Are copies of quarterly progress reports kept?	___	___	___	
11. Is the parents' acceptance or rejection of the educational plan in writing?	___	___	___	
12. If the educational plan was rejected by the parent(s), was an independent evaluation completed within 30 days?	___	___	___	
13. If the second plan was also rejected, was notice sent to the Bureau of Special Education Appeals within 5 days?	___	___	___	

14. If the case went to a hearing, please describe its status. _____

_____

15. What services are required by the educational plan? _____

_____

_____

Source of Information:

___Regular Teacher ___Special Teacher ___Itinerant Teacher

PROGRAM DELIVERY	Yes	No	Comments
1. Does student's daily schedule correspond with the educational plan?			
2. Does student have the proper physical equipment necessary to carry our educational plan?			
3. Have there been necessary modifications to physical facilities to carry out educational plan?			
4. Has teacher been adequately instructed in use of student's special equipment (if any)?			
5. Does teacher have adequate materials for student?			
6. Are the support services in educational plan being provided?			
7. Are parents informed in writing of student's progress at least quarterly?			
8. Does teacher work closely with other teacher(s) to coordinate student's program?			
9. Does teacher feel the student is progressing satisfactorily?			
10. Is the student's progress recorded?			
11. If progress is poor, is anything being done?			

PROGRAM AUDIT

PHYSICAL FACILITIES OBSERVATION FORM

School System: _____
School: _____
Level: EL MID HS

VARIABLE	ROOM 1	ROOM 2
TEACHER(S)		
CLASS-ROOM USE	__Resource Rm. __Tutorial __Substantially Separate Class __Other:_____	__Resource Rm. __Tutorial __Substantially Separate Class __Other:_____
FLOOR	_Bsmt _1 _2 _3 _4 _Other:_____	_Bsmt _1 _2 _3 _4 _Other:_____
LOCATION	__among other classrooms __end of corridor __other:_____	__among other classrooms __end of corridor __other:_____

PHYSICAL CONDITION

	ROOM 1 OK	ROOM 1 PROBLEM	ROOM 2 OK	ROOM 2 PROBLEM
Space				
Ventilation				
Lighting				
Acoustics				
Attractive-ness				
Maintenance				
Distractions:				
Visual				
Auditory				

FOR HEARING-IMPAIRED ONLY:

Classrooms have:	Yes	No
a. carpets	___	___
b. ceilings low enough for good acoustics	___	___
c. shades or drapes on windows	___	___
d. adequate overhead lighting	___	___

Do the physically-handicapped have access (i.e., ramps, wide doors, etc.) to the following:

	Yes	No
a. building itself. . .	___	___
b. lavatories	___	___
c. classrooms.	___	___
d. corridors	___	___
e. cafeteria	___	___
f. auditorium.	___	___
g. playground.	___	___
h. gymnasium	___	___
i. pool.	___	___
j. Other_____	___	___

BUILDING IN GENERAL

	Yes	No
1. Are the rooms in which special education programs provided:		
a. at least equal in all physical respects to the average standard for the rest of the school system?	___	___
b. adequate for the type of instruction?	___	___
c. adequate for the number of students accommodated?	___	___
2. Do the facilities for special needs students make it possible to integrate these students into the regular school program?	___	___

3. Overall condition of building: __excellent __good __fair __poor

SPECIAL EDUCATION

General Program Information
WAC 392-171-020 THRU

	% YES	DISTR													
1. Verification of District Enrollment															
2. Verification of participating Enrollment															
3. Agency Enrollment															
4. Private School Enrollment															
5. Verify Service Enrollment Speech Psych. L/LD															
6. Verification Pupil/ Teacher Ratio															
7. Comparison of Class Lists to A/C reported by categories a) Multiple Handicapped b) Sensory Handicapped, Blind															

Name_____ ESD____

Date_____

DATA REVIEW CHECKLIST

General Program Information WAC 392-171-020 THRU	% YES	DISTRICT						
7. (continued) c) Sensory Handicapped, Hearing Impaired d) Gross Motor & Ortho-pedically Impaired e) Mentally Retarded, Severely & Profoundly f) Neurologically Impaired g) Emotionally Disturbed h) Mentally Retarded, Moderately i) Sensory Handicapped, Partially Sighted j) Mentally Retarded, Mildly k) Learning/Language Disability								
8. Verify Self-contained teacher class size and Assignment								
9. Verify RR teacher class size and Assignment								
10. Verify Agency and other theme Assignment								

DATA REVIEW CHECKLIST

General Program Information WAC 392-171-020 THRU	% YES	DISTRICT						
11. Verify report of students for constructive service								
12. All psychologists paid by excess cost working in HC program								
13. All CDS paid by excess cost working in HC program								
14. OSP Certificated								
15. OSP Classified								
16. Verify reported expenditures on program								
17. Verify aide employed with HC								

DATA REVIEW CHECKLIST

General Program Information WAC 392-171-020 THRU	% YES	DISTRICT							
18. Travel expenditures appropriate to program									
19. Administrators employed full-time or at percentage of salary									
20. Clerical employed full-time or at percentage of salary									
21. Transportation Reimbursement									
22. Special Education Equipment Inventories									

KEY FOR DATA REVIEW CHECKLIST

Item I

Data Source

1.	E-222	-	P-223	- Compare grades - age.
	When reported		When Reported	Randomly select grades for one LEA.

2. Service LEA
   E-222 - Compare with Participating LEA Enrollment LEA Interdistrict Cooperative Arrangements. Spot check with participating district.

3. Compare Service LEA E-222 with agency enrollment.

4. Compare Service LEA E-222 with private school.

5. Compare service - of CDS
   Psych.
   L/LD

6. Compare P-223 - S-275
   See Bulletin Number _____ .

7. Compare E-222 with class lists.

8. Compare E-222
   Roster of Teachers
   Assignment in school - staff directory
   Assignment in school - teacher interview
   Teacher classroom enrollment records to verify class size.

9. Same as 8 except for RR teacher.

10. Compare E-222
    Agency assignment -
    Check with agency - hours - days -

11. Compre E-222 contractual services to contractual agreement or contract
    Names of students
    Days - hours - weeks - months of services received.

12. E-222 - psychologists
    Compare job assignments.

13. E-222 - CDS
    Compare job assignments.

14. Other support personnel - certificated - E-222 - Job assignment

15. Other support personnel - Noncertificated - E-222 - Job assignment

KEY FOR DATA REVIEW CHECKLIST
Item I
Data Source

16. Compare E-222
    Preliminary - revised - final
    With LEA budget.

17. E-222
    - aide - hours - cost per hour
    - P-223
    - verify with teachers.

18. E-222 Travel
    Travel vouchers of personnel employed in H/C

19. E-222 - Administrators - percentage of salary
    Job description -- S-275 - LEA personnel directory.

20. E-222 - Secretaries - same as administrators.
    P-223 --

21. Transportation reimbursement
    Compare - request
    - vouchers LEA

22. Check ESD records
    LEA records

SUPERINTENDENT OF PUBLIC INSTRUCTION
ESD MONITORING SUMMARY FORM FOR CRITICAL INFORMATION
(FOR FORMS E-678A-C)

SCHOOL DISTRICT _____ DATE _____

Information required to complete the Monitoring Forms:	N/A	YES %
A. WAC #392-171-040 through 050 REFERRAL PHASE		
(1) Student name		
(2) Birthdate - month, day, year		
(3) Grade (normal for age) i.e., 11 years - 6th year		
(4) Date of referral		
(5) Originator of referral (teacher, parent, etc.)		
(6) Parent consent for assessment (yes or no)		
(7) Date of parent consent for assessment		
B. WAC #392-171-055 ASSESSMENT PHASE		
(1) Student name or # from A(1)		
(2) Scholastic Data (yes or no)		
(3) Date of scholastic data (month, day, year)		
(4) Physical assessment data (yes or no)		
(5) Date of physical assessment (month, day, year)		
(6) Adjustment assessment data (yes or no)		
(7) Date of adjustment assessment data (month, day, year)		
(8) Instruments used (list - i.e., WISC, WRAT, etc.)		
(9) Summative Analysis (yes or no)		
(10) Date of Summative Analysis (month, day, year)		
(11) Formative Data (yes or no)		
(12) Date of Formative Data (month, day, year)		
(13) Goals written (yes or no)		
(14) Date goals written (most recent--month, day, year)		
(15) Objectives written (yes or no)		
(16) Date of most recent objectives (month, day, year)		
C. WAC #392-171-095 through 195 PLACEMENT ELIGIBILITY		
(1) Students name or # from A (1)		
(2) Parent approval of goals and objectives (yes or no)		
(3) Date of parent approval of goals and objectives (month, day, year)		
(4) Parent consent for placement (yes or no)		
(5) Date of parent consent		
(6) Type of program placement (i.e., resource room, self-contained)		

SUPERINTENDENT OF PUBLIC INSTRUCTION
ESD MONITORING SUMMARY FORM FOR CRITICAL INFORMATION
(FOR FORMS E-678A-C)

SCHOOL DISTRICT _____ DATE _____

Information required to complete the Monitoring Forms:	N/A	YES %
(7) Is type of placement documented?		
(8) Date of placement (month, day, year)		
(9) Category of handicapping condition (i.e., emotionally disturbed, mild mentally retarded, etc.)		
(10) Categorical eligibility documented (yes or no)		
(11) Documentation criteria (list i.e., 95IQ - WRAT Reading level 6.2 - Math 5.1 - VMI 1.2 lag, etc.)		
D. RE-EVALUTION		
(1) Re-evaluated (yes or no). Suggested N/A unless student in program 2 years		
(2) Date of most recent re-evaluation (month, day, year)		

FORM COMPLETED BY ESD DIRECTOR: _____ DATE: _____
Signature

ESD: _____

ADDITIONAL PERSONS INVOLVED IN COMPLETING THE MONITORING:

_____

_____

_____

_____

_____

231

PERCENTAGE (YES) SPECIAL EDUCATION MONITORING COMPLIANCE BY ESD AND STATEWIDE

ESD: _____ DISTRICTS SC DIST. AVE.

A. WAC #392-171-040 through 050 REFERRAL PHASE

(1) Student name
(2) Birthdate - month, day, year
(3) Grade (normal for age) i.e., 11 years - 6th yr.
(4) Date of referral
(5) Originator of referral (teacher, parent, etc.)
(6) Parent consent for assessment (yes or no)
(7) Date of parent consent for assessment

B. WAC #392-171-055 ASSESSMENT PHASE

(1) Student name or # from A (1)
(2) Scholastic Data (yes or no)
(3) Date of scholastic data (month, day, year)
(4) Physical assessment data (yes or no)
(5) Date of physical assessment (month, day, year)
(6) Adjustment assessment data (yes or no)
(7) Date of adjustment assessment date (month, day, yr.)
(8) Instruments used (list - i.e., WISC, WRAT, etc.)
(9) Summative Analysis (yes or no)
(10) Date of Summative Analysis (month, day, year)
(11) Formative Data (yes or no)
(12) Date of Formative Data (month, day, year)
(13) Goals written (yes or no)
(14) Date goals written (most recent - month, day, yr.)
(15) Objectives written (yes or no)
(16) Date of most recent objectives (month, day, year)

C. WAC #392-171-095 through 195 PLACEMENT ELIGIBILITY

(1) Students name or # from A (1)
(2) Parent approval of goals and objectives (yes or no)
(3) Date of parent approval of goals and objectives (mo., day, yr.)
(4) Parent consent for placement (yes or no)
(5) Date of parent consent
(6) Type of program placement (i.e.,
(7) Is type of placement documented?
(8) Date of placement (month, day, year)
(9) Category of handicapping condition (i.e., E.D., MMR, Deaf, etc.)
(10) Categorical eligibility documented (yes or no)
(11) Documentation criteria (list - i.e., 9510, WRAT, Reading level 6.2, Math 5.1, - VM 1.2 lag., etc.)

D. Re-Evaluation

(1) Re-evaluated (yes or no). Suggest H/A unless student in program for 2 years.
(2) Date of most recent re-evaluation (month, day, year)

Completed by: _____

Date: _____

AFTER THE ON-SITE VISIT

PRELIMINARY DRAFT OF FINAL REPORT

Preparation

The following information which should be included with the preliminary draft of the Final Report may be divided between an Introduction and a Conclusion or may all be included in the Introduction ( ):

- ☐ Date and Location of Audit
- ☐ Purpose/Importance of Audit to Division and LEA
- ☐ Description of Audit Process:
  - Individual Case Studies (Number or percent sampled)
  - Distribution and return of questionnaires
  - Who was interviewed and how many (total)
  - Selection and composition of team (do not identify individual team members with any one area of report)
  - How Final Report was developed and what it includes
- ☐ Some generalizations of major strengths and problem areas found as result of audit
- ☐ Any statement of praise for quality and level of commitment of LEA staff, etc.
- ☐ Statement of appreciation for cooperation and hospitality of LEA
- ☐ Statement of commitment of Division to provide technical assistance to LEA in implementing the recommendations

By the time the on-site visit and the feedback session with the Special Education Administrator are completed, the body of the preliminary draft should need only general editing for style, grammar, punctuation, spelling (someone in your regional office who is skilled at writing might be helpful here).

Also check for:

- Placement of statements in proper area. (Use the list of goals and criteria in section as a guide.)
- Any conflicts between commendations and problem areas or non-compliance issues.

Any additional in-depth reports should be included as a subsection in one of the nine major areas e.g. Individual Case Study under Core Evaluation and Program Delivery.

It is not necessary to write separate introductions for each area or to include extraneous materials.

Review by Central Office and Special Education Administrator

The Preliminary draft, including the Introduction and Conclusion, is then forwarded to the Central Office for final editing recommendations, and to the Special Education Administrator to review for factual accuracy with specified date for return.

It is important to send the preliminary report to Central Office for three reasons:

- It is the only way for the Division to maintain a high degree of consistency and equitability in the Final Reports from region to region.
- It provides another perspective to the Chairperson from someone who sees the report with a fresh eye.
- It shares the responsibility between regional and central office for standing behind the report, particularly in the event of a non-compliance action.

COMPLETING THE FINAL REPORT

Format

Once agreement is reached on the factual accuracy, the report is ready for final typing and reproduction. There are specially designed forms to be used for all parts except the Introduction.

The format is as follows:

Cover -	with name of school system and date on label in box.
Title Page -	with name of school system, date of report, Superintendent, School Committee Chairperson, Administrator of Special Education, and list of team members.
Introduction -	typed on Department letterhead
Body of Report -	Commendations, problem areas and non-compliance issues (if any) with recommendations for each of the nine areas in Section .
Conclusion -	if you wish to include one. If not, material should be included in Introduction.

Reproduction and Binding

The finished original may then be sent to the Central Office for duplication and binding. The bound copies will then be returned to the Regional Office for distribution. Or, if you prefer, you may duplicate and bind them at the Regional Office.

Distribution

Three copies to LEA : School Committee, Superintendent, and Special Education Administrator

Three copies to Central Office

One copy to each Regional Office

One copy to Regional Advisory Council

One copy to each team member upon request

RESPONSE BY LEA TO FINAL REPORT

Written response to the Final Report by the school district is requested within four weeks of receipt of the report by the School Committee. The response should outline the following:

- Specific action plans to correct each non-compliance issue
- Broad action plans to deal with identified problem areas

(See for model cover letter to accompany Final Report to LEA)

NON-COMPLIANCE

In the event that a Final Report includes non-compliance issues the following steps are taken:

Regional Office follows up:

- Personal appointment with Special Education Administrator and Superintendent
- Written statement of resolutions and action planned from School Committee (Part I in written response from LEA)
- Review by Regional Office Project Directors to validate compliance

Unresolved Non-Compliance

- Written statement from Regional Office to School Committee regarding specific unresolved non-compliance issues with request for response
- Response from School Committee on same
- Regional Office refers cases to Legal Office, Director of Program Audit and Assistance, and Associate Commissioner
- Legal Office determines legal options, in consultation with Associate Commissioner and Commissioner
- Legal Office, Associate Commissioner, Commissioner, and Director of Bureau of Program Audit and Assistance determines which option(s) will be exercised including, but not limited to, recommendation to the Board of Education that funds be withheld from the non-complying School Committee, and referral of the matter to the Attorney General for litigation

FOLLOW-UP ASSISTANCE

The Final Report serves as a working document between the Division and the LEA in providing technical assistance.

The changes recommended in the Final Report should then be reflected in the new local education plan.

The major focus of the follow-up is to try to link needs identified in Final Report with existing and developing resources. The Division of Special Education is in the process of identifying and coordinating access to the following resources:

- the Area Learning Resource Centers which are in the process of development
- model programs in public schools, e.g. secondary programs, early childhood programs, programs for hearing impaired children, staff development and evaluation programs
- planning networks involving all public and private institutions of higher education which offer course work, degree programs, short range in-service training and long-range staff development
- federal funds for teacher training and programs for children
- other proposed local, regional, state, and national information and resource systems

TEAM REPORT FORMAT

Although the team report will still follow the section headings in the PR document in general, the following is a recommended format for consistency of reports. The submitted team report should be double spaced and completely developed in all areas. Areas in parentheses are suggested for inclusion under the major section headings as indicated:

ADMINISTRATION AND SUPERVISION

Comments - program strengths and commendations

(director of special education)
(supervisors and coordinators)
(organization)

Concerns - problem areas

Recommendations - to match concerns item by item
(NUMBERED AND PRIORITIZED IF POSSIBLE)

STUDENT REFERRAL
(FERPA considerations)

CASE CONFERENCE
(least restrictive alternatives)
(IEP)

EARNED CREDIT AND DIPLOMAS
(Secondary curriculum across exceptionalities)
(Subject areas, work-study, PVE, extra-curricular)

INSTRUCTIONAL DAY

ADMINISTERING OF MEDICINES
(health services)

PLACEMENT
(annual case reviews)

PROGRAMS AND SERVICES
(class size, caseloads, age ranges)
(speech and hearing)
(audiology)
(Multi-categorical)
(in-service)
(curriculum and instructional materials)
(student progress reports and evaluation)
(extra-curricular activities)

PARAPROFESSIONALS
(in-service)
(parent-aide programs)
(parent-teacher conferences)
(parent-school organizations)

PUPIL PERSONNEL SERVICES
(psychological services)
(contractual arrangements)
(social worker)
(guidance counselors)

FACILITIES

PHYSICAL AND/OR OCCUPATIONAL THERAPY

TRANSPORTATION

PERSONNEL CERTIFICATION
(instructional)
(administrative)
(supervisory)
(ancillary)

CHILD-FIND SYSTEM
(unserved children)
(PR document-Unit IV)

GDC/cm

3/8/77

PREFACE

The special education program at _____ District was monitored on _____. The purpose of this visit was to determine compliance with state and federal laws relating to special education and to offer suggestions for program improvement.

The START visit consisted of a total of _____ hours in the district. The following activities were reported on during the three day visit:

Interviews with Administrators	_____
Interviews with Classroom Teachers	_____
Interviews with Parents	_____
Interviews with Psychologists	_____
Interviews with Special Education Teachers	_____
Facilities Reviewed	_____
Placement Documentation Checked	_____

The following persons served as monitors during the three-day visit:

I. PROGRAM DESCRIPTION

A. Available Services and Enrollment

Special education programming for the handicapped includes

Gifted programming is

Supportive services available for special education include

The following enrollment figures from _____ District are based upon the Census Report of _____ and the current register report.

Elementary - District ADM - _____

Category	Resource	Self Contained	Total	Percentage of School Population
EMH	—	—	—	—
EH	—	—	—	—
HH	—	—	—	—
HBD	—	—	—	—
MH	—	—	—	—
PH	—	—	—	—
TMH	—	—	—	—
LD	—	—	—	—
SPH	—	—	—	—
VH	—	—	—	—

Total Handicapped -
Percentage of School Population -

High School - District ADM - _____

Category	Resource	Self Contained	Total	Percentage of School Population
EMH	—	—	—	—
EH	—	—	—	—
HH	—	—	—	—
HBD	—	—	—	—
MH	—	—	—	—
PH	—	—	—	—
TMH	—	—	—	—
LD	—	—	—	—
SPH	—	—	—	—
VH	—	—	—	—

Total Handicapped -
Percentage of School Population -

B. Staff Certification

Prior to the START visit, the area and level of certification were checked for all special education staff. _____ teachers hold special education certification at the following levels:

Level of Special Education Certification	Number
Standard	_____
Basic	_____
Temporary	_____
Provisional	_____

_____ teachers hold certification in more than one area of exceptionality. Special education staff are/are not assigned to areas appropriate to their certification.

C. District Procedures for Identification and Placement

The following procedures were described by the Special Education Administrator:

Public Awareness

Identification

Referral

Evaluation

Placement

Review of Placement

II. STRENGTHS

The START team noted many strengths; the following are listed as outstanding for this district:

III. SUGGESTIONS FOR PROGRAM IMPROVEMENT

The following information was based upon staff interviews and observations of monitors. The district is not required to implement these suggestions, but is encouraged to carefully review them and determine which are appropriate to identified needs. This section does not include information concerning compliance with state and federal regulations.

PROBLEM AREA	SUGGESTION
1.	1.
2.	2.

IV. PERSONNEL DEVELOPMENT NEEDS

The following suggestions for inservice training were based upon questionnaires sent to special and regular education teachers, administrators and support staff in your district.

1.

V. COMPLIANCE WITH STATE AND FEDERAL REGULATIONS

The START monitoring process includes a determination of district compliance with state and federal special education regulations. This is accomplished through interviews with staff and parents in your district as well as a review of placement documentation. The following table lists noncompliance findings, references the state or federal regulation and gives recommended action. Your district is required to submit a plan describing corrective action to be taken for each finding listed within 30 days of the receipt of this report.

FINDING	REGULATION	RECOMMENDED ACTION

FOLLOW-UP ACTIVITIES

A. COMPLETION OF THE FINAL REPORT

Completion of the Final Report is the responsibility of the START Coordinator and the Division of Special Education, office. Sections I and IV of the report are written in and sections II, III, and V are completed by the START Coordinator. The Coordinator should carefully review all sections completed by monitors and if necessary check the individual Summary Forms to determine appropriateness of the findings and recommendations identified by monitors. The Final Report must be sent to the office no later than two weeks following the START visit and will be sent to the District one month following the visit.

B. ACTION PLANS

Each district will be required to develop a plan to correct each non-compliance area identified in the Final Report. This Action Plan will be sent to the Division of Special Education within one month following receipt of the Final Report. Review and Approval of Action Plans will be handled by Division of Special Education staff members. Districts may request technical assistance from the Division Consultant assigned to the district when developing Action Plans.

C. FOLLOW-UP VISIT

A follow-up visit will be conducted by the Division Consultant assigned to the district within three months following approval of the Action Plan. The purpose of this visit is to verify implementation of the Action Plan. A report of the follow-up visit will be sent to the district within one month after the follow-up visit.

TECHNICAL ASSISTANCE REQUEST

District_____ Date_____

Contact Person_____

List technical assistance needed from the Department of Education (such as SELECT or Consultant Cadre) in order to implement suggestions given in your START Final Report. This form may be returned with your Action Plan.

Technical Assistance Need	Possible Dates	Services Requested		
		SELECT	CADRE	Other-specify

FOLLOW-UP VISIT

District_____ Consultant_____

Date of Follow-up_____ START Visit Date_____

Non-compliance Item	Action Plan	C	NC	Method of Verification

262

263

United States Office of Education
Bureau of Education for the Handicapped
Division of Assistance to States

PROGRAM ADMINISTRATIVE REVIEW PROCESS: AN OVERVIEW

The Division of Assistance to States, Bureau of Education for the Handicapped routinely conducts compliance monitoring activities known as Program Administrative Reviews. The primary purpose of this activity is to determine the extent to which each State's special education policies, procedures and practices are consistent with Federal statutes, regulations and Annual Program Plans.

Authority

The authority for this monitoring activity is found in the following statutory and regulatory provisions:

1. EHA-B, as amended by P.L. 94-142, (Section 616(a)): "Whenever the Commissioner finds that there has been a failure to comply substantially with any provision of Section 612 or Section 613 or that in the administration of the State Plan there is a failure to comply with any requirements set forth in the application of a local educational agency or intermediate education unit approved by the State Educational Agency pursuant to the State plan, the Commissioner...may...withhold further payments" (20 U.S.C. 1416(a))
2. ESEA Title I P.L. 89-313, General Provisions for Programs Subpart Q Monitoring and Reporting of Program Performance 100b.

436: "Site Visits will be made by representatives of the Department of the Commissioner as frequently as practicable to...review program accomplishments and management control systems..."

Philosophy

The conduction of compliance monitoring activities through the implementation of the Program Administrative Review process is viewed by BEH as consistent with the responsibility to administer the State grant programs authorized under EHA-B (as amended by P.L. 94-142) and ESEA, Title I (as amended by P.L. 89-313). However, the primary objective of this process is to work in cooperation with State Education Agencies to assure that all handicapped children actually have available a free, appropriate education and to establish--to document--that Congressional intent is actually realized by these programs. It is critical that all parties understand that the goal of compliance monitoring is NOT to "catch" administrators in noncompliant situations, but to facilitate the development of more appropriate programs. It is for this reason that the Program Administrative Review process employs openness in pre-visit phases, encourages self-study efforts by state and local program managers before the on-site phase, and offers technical assistance during the week of the visit and after the review has been completed.

Standards

The standards utilized by the Program Administrative Review process include Federal statutes, Federal regulations, and each State's current Annual Program Plan. The statutes involved are EHA-B, as amended by P.L. 94-142 and ESEA, Title I, as amended by P.L. 89-313. At this point in time, final Federal regulations only exist for P.L. 94-142.

Specific, measuranble standards are desired if compliance monitoring activities are to be seen as valid and constructive. As State's Annual Program Plans describe the procedures and processes to be used to implement P.L. 94-142 in some detail, and as all such procedures and processes meet the requirements of Federal statutes and regulations in order to be approvable, it is these APPs that most clearly serve as programmatic standards for compliance monitoring.

For FY '78 Program Administrative Reviews, the following programmatic variables will be the major topics of discussion between BEH and SEA personnel:

P.L. 94-142

Development of FY '78 Annual Program Plan

Right to Education Policy

Full Education Opportunity Goal

Priorities

Child Identification, Location and Evaluation

Individualized Education Program

Procedural Safeguards

Confidentiality

Least Restrictive Environment

Protection in Evaluation Procedures

Comprehensive System of Personnel Development

Participation of Private School Children

Placement in Private Schools

SEA Responsibility for all Programs

Program Monitoring

Program Evaluation

Reporting

Child Count Procedures

Administration of Funds by SEA

Administration of Funds by LEAs

State Advisory Panel

P.L. 89-313

Agency Eligibility

Children to Receive Benefits

Transfers

Evaluation Design

Measurable Goals and Objectives

Administration and Technical Assistance

Dissemination

Distribution of Funds

Supplemental Use of Funds

Procedures

In order to assure equity across time, States and agencies, specific procedures and materials have been developed to lend structure to the Program Administrative Review process. Several major procedures utilized are described below.

1. Use of questionnaires--In order to increase the number of LEAs and SOPs from which information is gathered, questionnaires are sent to a sampling of local programs previous to the on-site phase of each Program Administrative Review. Information received by BEH from selected local programs is utilized to

select LEAs and SOPs for on-site visits and to generalized to statewide procedures and practices.

2. Use of structured interviews--After questionnaire information is processed certain LEAs and SOPs are selected for on-site visitation. Also, certain SEA, statewide advisory panel, and parent group members are interviewed. All such interviews are structured according to standard materials called "interview guides".

3. Persons interviewed--All Program Administrative Reviews attempt to gather information reflecting the current status of each State's educational delivery system for handicapped children. It is important that representative information be accumulated, that as many sources of information as possible be tapped, and that these sources be consistent across time and States. Therefore, each Program Administrative Review team interviews: a) the SEA Director of Special Education and as many of his/her staff as is appropriate, b) LEA administrators who have the responsibility for programming for handicapped children, c) school program directors within State Operated Programs, d) one or more members of the statewide advisory panel, and e) one or more members of parent groups.

4. Sample selection--As indicated above, five sources of information are utilized in the Program Administrative Review process--SEA personnel, LEA personnel, SOP personnel, advisory panel members and parent group members. In the case of LEAs and SOPs, in most states there are dozens if not hundreds of programs to select

from, for both questionnaire sampling and on-site review selection. The FY '78 Program Administrative Review process utilizes a formula to randomly select LEAs and SOPs. This methodology eliminates LEAs with ADA counts below 600 ADA, and includes all "large" school districts. This methodology yields some 1400+ LEAs per year as recipients of questionnaires. A similar methodology to select SOPs yields at least another 1400+ local programs as recipients of questionnaires. From this sample of LEAs and SOPs, a subsample is selected for on-site visits by BEH team members. The set of criteria for selecting these local programs for on-site visits include: size of LEA/SOP; the rural-urban-suburban status of the community in which the program is located; geographic dispersion; whether or not the program is a recipient of EHA-B funds, 313 funds, or early childhood incentive grant funds; potential problem areas; potential exemplary practices; handicapping conditions served; whether the program is residential or day school; and travel and time constraints for BEH personnel.

Since there is only one SEA and typically only one Statewide Advisory Panel, there is no need to discuss sample selection for these two sources. Obtaining information from parents of handicapped children, however, presents quite another problem.

Currently, the Program Administrative Review process utilizes parent information from organized parent groups only. Because of the wide variance among the States, no one methodology for parent group selection is used. Rather, five somewhat different methods of selecting groups for interviews

have been adopted as acceptable. The one method selected for a given State in a given year depends upon the circumstances in the State, as determined mutually by the BEH team chairperson and that State's SEA Director of Special Education.

Materials

To facilitate an acceptable amount of consistency in interviewing and recording, two primary types of materials have been developed to structure the Program Administrative Review process. These were developed in the form of questionnaires and interview guides. As previously indicated, questionnaires are used to gather compliance information from LEA and SOP administrators, and interview guides assist BEH interviewers in collecting information from SEA personnel, advisory group members, and parent group representatives.

Additional value to the utilization of such materials is realized when these materials are disseminated prior to the site visit--giving all participants the opportunity to use them in "self-study" activities and to make preparations before the interviews that should minimize the time required for such interviews.

On-Site Activities

An annual schedule is prepared during the summer months which illustrates the tentative dates of week long Program Administrative Reviews to be conducted during the following fiscal year. This typically includes one-half of the states and territories. Initial notification of such visits consists of a letter to each Chief State School Officer involved as early as possible--usually by September. This early notification allows time for SEA staff to check for conflicts and a request for a change in the date of the visit.

During the week of the visit, BEH team members (normally four in number) are teamed with SEA personnel so that all interviews include BEH and SEA representation as well as other agencies and groups.

For 3 to 3 1/2 days teams collect information through the conduction of interviews and the observation of policies, procedures, records, reports, memoranda, etc. Usually by Thursday afternoon, the BEH team members go into executive session to analyze information collected, reach consensus regarding various procedures and practices, and prepare tentative reports for exit interviews with SEA personnel and the Chief State School Officer.

On Friday morning of the week involved (typically), the BEH team shares these tentative findings with the SEA Director of Special Education and selected staff members. During this meeting, BEH team members review their findings with SEA staff to verify that no misinformation has been included, that no major segment of information has been overlooked, or that no invalid conclusions have been drawn. If there have been areas of noncompliance determined, this meeting also affords the first opportunity to discuss the kinds of mutually acceptable corrective actions that will be required.

An exit interview is also held with the Chief State School Officer to brief him/her regarding the weeks' activities and the findings and possible corrective actions and/or recommendations. The formal reporting procedures are explained to the Chief State School Officer and this concludes the on-site phase.

Reporting

Immediately after the BEH team returns to Washington, a draft report of the findings of the on-site review is written. This report cites the

authority for each programmatic variable reviewed, a description of the findings related to each variable, required corrective actions to be implemented by the SEA (if any), timelines for the accomplishment of such corrective actions (if any), and the methods that the SEa is to utilize to verify to BEH that such corrective actions have been completed.

The SEA is sent a copy of the draft, and requested to contact BEH within two weeks if any exception is taken to the content. After the two week period has elapsed, and considering any reactions to the draft by the SEA, a final report is issued to the office of the Chief State School Officer. At this point, the content of the Program Administrative Review becomes public information.

Followup

In most cases, verification that corrective actions have been completed is supplied by the SEA via phone calls, letters, and copies of policies/procedures. In some instances, however, followup visits are made to confirm the required changes in policy, procedure and/or practice.